

From: Scott Davis [mailto:davis@scottdavispc.com]
Sent: Friday, October 27, 2017 3:26 PM
To: EBSA, E-ORI - EBSA
Subject: RIN 1210-AB39

Dear Mr. Hauser,

Please be advised that I am an attorney who represents claimants in disability claims that are governed by ERISA.

Please also be advised that I am respectfully requesting for the Secretary of Labor to not delay the effective date of the Final ERISA claims regulations which were adopted on December 19, 2016.

As you know, the Department of Labor has already addressed all the concerns raised by the insurance companies and plans who allege a need for the delay. These parties have had more than sufficient time to provide their comments and thoughts on the proposed regulations. The Department of Labor has also evaluated the potential cost increases to the plans and insurance companies and determined that they are financially of no consequence.

In summary, the Department of Labor has thoroughly examined and evaluated the regulations. As a result, the Department of Labor has proposed well thought out regulations which quite frankly, are immediately desperately needed by claimants to protect their rights under ERISA.

In summary, please do not delay in implementing the proposed regulations, thank you for your time.

Scott E. Davis

Disability Attorney

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