From: Linda Miller [mailto:Imiller@holmesmurphy.com] Sent: Tuesday, April 12, 2011 8:25 AM To: EBSA, E-ORI - EBSA Subject: Comments on Electronic Distribution Rules

As a long-time HR professional and current benefits consultant, I know that plan sponsors are spending huge amounts of money printing and distributing SPDs to their employees. Aside from the ecological damage (the average SPD is 100+ pages, so the amount of paper required for an employer with just 500 employees is colossal!), the cost of printing and distribution could be much better used in providing actual benefits to participants. I am in favor of changing the rules to permit plan sponsors to provide a postcard or other nonelectronic notice of of the availability of an SPD (along with a description of the significance of this document) notifying the individual of the availability of an electronic copy AND their right to receive a printed copy upon request. This would save a significant amount of waste from discarded SPDs that discarded as soon as they are received.

Linda Miller, SPHR Sr. Account Executive/Corporate Benefits Holmes Murphy & Associates (214) 265-6301 (direct)