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Sent: Tuesday, April 19, 2011 12:49 PM
To: EBSA, E-ORI - EBSA
Subject: Comments on Electronic Disclosure Rules

As an ERISA attorney for the past 12 years, I have had the opportunity on numerous occasions to assist employers in complying with the electronic disclosure rules. I submit the following recommendations for improvement:

1. Permit the employer to set up a kiosk where information could be accessed electronically for those employees who do not have regular access to systems as an integral part of their daily duties. Notice of the availability of the documents could be provided via written letter to the employee.
2. Permit the employer to require all folks with electronic access as regular part of their duties to receive documents electronically unless they affirmatively opt out.

Thank you for the opportunity to comment.

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