

December 5, 2016

Office of Regulations and Interpretations
Employee Benefits Security Administration
U.S. Department of Labor
200 Constitution Avenue, N.W., Room N-5655
Washington, D.C. 20210

Re: Proposed Revision of Annual Information Return/Reports (Form 5500 Series) - RIN 1210-AB63

Cherry Bekaert LLP is a CPA firm with a qualified plan department. We service the retirement plans of over 300 plans in the Hampton Roads, Virginia area.

One of our services is the preparation and filing of Form 5500 (or Form 5500-SF for small plans). We have serious issues with the additional data requirements contained in Proposed Revisions (the "Proposal") to Forms 5500 and 5500-SF.

The majority of our clients are small and the information you are requiring to be reported is not readily available. Thirty five percent of our clients are not in recordkeeping platforms and do not employ the staff with the time nor the technical knowledge to be able to accumulate the required data. To hire someone to pull the information would be cost prohibitive.

Small businesses are currently struggling in this economy to pay the fees currently required to properly administer their plans and keep their annual filings up to date. Over the last few years we have seen many plans terminate because they couldn't afford the fees. To add additional labor intensive requirements to the Form 5500 would be the nail in the coffin for many plans.

We respectfully request that the DOL re-evaluate the pertinent information that should be reported on the Form 5500 and consult those involved in the industry, i.e. plan sponsors, service providers, recordkeepers, insurance companies and plan participant representatives so that the return can be prepared in a cost-effective manner.

Thank you for your consideration of these comments.

Sincerely,



Leta B. Rech, QKA
Qualified Plan Consultant