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Submitted electronically to e-ORI@dol.gov

March 10, 2008

Employee Benefits Security Administration
Office of Exemption Determinations
Rooms N-5655
U.S. Department of Labor
200 Constitution Avenue, NW.
Washington, DC 20210

Re: 408(b)(2) Hearing, March 31-April 1, 2008

The Investment Company Institute requests the opportunity to testify at the above-referenced hearing. We expect that Paul Stevens, President and CEO of the Institute, will testify on behalf of the Institute and its members. We understand that the date of the hearing will be postponed to March 31 and April 1, if necessary.

Outline of Topics to Be Covered (and approximate time allotted for each):

1. Principles that should underlie a revised 408(b)(2) regulation (3 minutes)
2. Features of the Department's proposal that should be retained (3 minutes)
3. Features of the Department's proposal that should be revised to achieve a more workable and useful disclosure regime (3 minutes)
4. Need for reasonable implementation period (1 minute)

Please contact Michael Hadley (202-326-5810) with any questions.

Sincerely,

/s/ Michael Hadley

Michael L. Hadley
Associate Counsel – Pension Regulation