



September 30, 2011

E-OHPSCA2715.EBSA@dol.gov

Department of Labor

Office of Health Plan Standards and Compliance Assistance

Employee Benefits Security Administration, Room N-5653,

U.S. Department of Labor, 200 Constitution Avenue NW.,

Washington, DC 20210,

Re: Comments to RIN 1210-AB52

Dear Sir or Madam:

This letter is in response to your requests for comments regarding the four page summary of benefits required by PPACA. It is required to be provided to our employees starting March 23, 2012.

Our bank sponsors a self-funded group health plan. As you know the notice was drafted by the NAIC representatives. Many of the terms and provisions are not easily applicable to self funded plans. It is important to us that the notices be correct and complete and provided on a timely basis as required by the regulations.

We are requesting that you delay the effective date for the implementation of the four page summary notice for self-funded plans to give us the opportunity to comply with the requirements.

Sincerely,

Arthur H. Thompson

President