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Submitter Information

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General Comment

DEPARTMENT OF LABOR
Employee Benefits Security Administration
29 CFR Part 2520
RIN 1210-AB66
Revisions to Annual Return/Report--Multiple-Employer Plans

I strongly urge and request the US Department of Labor (DOL) to modify the interim final rule to make clear participating employers of a multiple employer plan (MEP) will not be disclosed to the public.

The list of employers participating in each MEP is private, proprietary, and competitive information for many industries such as the professional employer organization (PEO) industry. The participating employers of a PEO's MEP are clients of the PEOs, so requiring a PEO to disclose a list of participating members to the public would in fact be requiring a business to disclose to competitors a list of its clients.

Disclosing a list of clients to the public likely was not envisioned by Congress or the DOL, and disclosing a list does not further any public policy or compliance objectives. Doing so would only harm a legitimate business by making public the business's clients.

I appreciate your consideration of my comments and ask that the DOL and related agencies make clear in the final rule that the participating employers of a MEP will not be disclosed to

the public.

Thank you.