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Sent: Friday, March 19, 2004 10:17 AM
To: efast2@dol.gov
Subject: EFAST Request For Comment

To: EFAST Program Office
Employee Benefits Security Administration
Room N-5459, U.S. Department of Labor
200 Constitution Avenue NW, Washington DC, 20210

Attn: EFAST RFC

This is a response to the Request for Comment regarding proposed changes to the EFAST filing system. Our company, BLAZE SSI Corp., is an approved EFAST software vendor. We have the following comments:

Section C. Item 1. Method of filing:

1. BLAZE SSI has no problem in developing a vendor-created Web-based system for electronic filing.
(reference: Section C. Item 1)
2. There should be a reasonable transition period for the elimination of the machine print form filing. Many administrators are relying upon the availability of the current workflow. Since the current rate of electronic filing is only 2%, the switch to EFAST2 represents a dramatic change for a vast majority of administrators.
(reference: Section C. Item 1)
3. The major problems with Electronic Filing have nothing to do with developing a system to do it. Instead, the problems include:
 - a) The complexity of electronic signatures.
(reference: Section C. Item 2)
 - b) Data collection and form completion which is divided among several entities performing plan administration. This is not limited to the plan actuary and administrator.
(reference: Section C. Item 6)
 - c) The requirement that the electronic filing contain all forms and attachments is an obstacle.
(reference: Section C. Items 1 and 6)
 - d) The security surrounding electronic signatures and verification needs to permit the delegation of authority on a form by form basis.
(reference: Section C. Item 2)
4. Under the current EFAST system software developers may become certified in producing 5500 Forms using four EFAST filing methods. These are (1) Machine print using EFAST Print

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Control software; (2) Machine print using developer-generated software (NOT using EFAST Print Control Software; (3) Computer-generated Hand Print; and (4) Electronic Filing. We do not think it would be correct for EFAST2 to eliminate the Machine-print forms using the EFAST Print Control and allow a vendor to produce developer-generated machine-print forms. Similarly, it would not be correct for EFAST2 to eliminate the machine-print forms and allow a vendor to produce computer-generated hand print forms.

(reference: Section C. Items 1 and 7)

5. We do not know why there should be a filing fee charged for the electronic filing system.
(reference: Section C. Item 3)

6. If these proposed changes go into effect, we do not anticipate a large market for a third-party system developed for the purpose of filing 5500 forms. We do not see the incentive for an administrator to pay for a system to perform electronic filing when they can use an alternative EFAST2 Web-based system which will perform relatively the same task.

(reference: Section C. Item 1)

Sincerely,

Jim Carlson
VP - Customer Support
BLAZE SSI Corp.