



THE PENSION DESIGN GROUP

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

Dear Sir or Madam,

The Pension Design Group is a third-party administration firm for retirement plans. We service the retirement plans of over 300 employers, primarily in a tristate area.

Included in our annual administration is the preparation and filing of Form 5500 (or Form 5500-SF for small plans). In that capacity, we have serious concerns with the additional data requirements contained in Proposed Revisions (the "Proposal") to Forms 5500 and 5500-SF, as follows:

1. The Proposal will result in a substantial increase in both data gathering and form preparation time. Most of our clients sponsor small plans and in this market segment, increased plan operating expenses are borne by plan participants and beneficiaries of the plan.
2. Our firm would also be considered a small business - we employ 12 employees. We do not have the time or budget to instantly redesign processes and systems to capture and report data that has had not been previously required. Our software provider would need time to design the software to accommodate this data. We would need time to implement and create procedures for capturing that data and including it in their software. There should be sufficient implementation time allowed (24-36 months from the publication of final versions of the forms and instructions to the first day of the first plan year to be reported on the new forms).
3. We are quite concerned about the inclusion of the preparer information being available to the public. While we have no objections making this information available to the IRS or to the Department of Labor, we have a serious concerns about our client list being made available to the public. EFAST2 (the electronic filing system for the 5500 series) has the ability to collect

760 LAKEVIEW PLAZA BOULEVARD, SUITE 700 • WORTHINGTON, OHIO • 43085

614.888.6008 • WWW.PENSIONDESIGNGROUP.COM

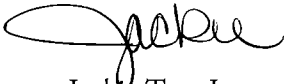
data but also to suppress certain data elements from public disclosure. This would be an easy fix.

Based on the concerns outlined above, we request that the DOL do the following:

1. Involve industry stakeholders in the design and implementation of a project of this magnitude, (plan sponsors, service providers and plan participant representatives) so that a common-sense and cost-effective approach can be used to gather additional data.
2. Eliminate the public disclosure of preparer information, so that 1) our firm can remain in business to provide quality service to our clients and to continue to employ our employees, and 2) businesses that undertake the risk and expense of sponsoring a retirement plan are not subjected to additional marketing and cold-calling (as a reward) for sponsoring a retirement plan.

Thank you for your attention to our concerns. If you have any questions, please don't hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Jackie", with a large, sweeping flourish at the end.

Jackie Tarr-Jones
Client Services Manager