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**From:** Bremen, Ross A. [mailto:RBremen@nepc.com]  
**Sent:** Monday, August 16, 2010 10:21 AM  
**To:** EBSA, E-ORI - EBSA  
**Subject:** Lifetime Income Joint Hearing

August 16, 2010

**Via E-mail:** [e-ORI@dol.gov](mailto:e-ORI@dol.gov)

Office of Regulations and Interpretations

Employee Benefits Security Administration

Room N-5655

U.S. Department of Labor

200 Constitution Avenue, N.W.

Washington, DC 20210

Attention: Lifetime Income Joint Hearing

Dear Ladies and Gentlemen:

NEPC respectfully requests the opportunity to participate in the Lifetime Income Joint Hearing conducted by the U.S. Department of Labor, Internal Revenue Service, and Department of the Treasury.

NEPC has been providing investment consulting services for traditional and alternative assets for over twenty-four years and is one of the largest investment consulting firms in the country. NEPC consults to over 100 defined contribution programs, with total assets in excess of \$70 billion accumulated by over 1 million participants. NEPC does not offer investment products, and our investment advice and recommendations are unbiased and without conflict. We accept our role as a fiduciary and serve the singular interest of plan sponsors and the participants they represent. NEPC is frequently requested to speak at industry conferences on the topic of income solution products. Ross Bremen, CFA, Partner in the Defined Contribution Practice, will testify on behalf of NEPC.

NEPC's testimony will focus on plan sponsor safe harbor considerations and how changes to the safe harbor provisions would promote

innovation and alleviate sponsor concern when selecting a lifetime income option. NEPC will support its testimony with findings from our annual Plan and Fee Survey which provides us with a great deal of insight on sponsor adoption of plan features after regulatory safe harbors were provided.

Thank you for consideration of our request.

Sincerely,

Ross A. Bremen, CFA

Partner