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**Subject:** Summary of Benefits  
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Department of Labor

As you review the comments submitted regarding the mandated Summary of Benefits, please take the following into consideration:

1) The consumer electronic laws referenced in the interim final regulations are woefully outdated. Our member, especially the demographics below 50, prefer to receive their information electronically. The regulations, as written, will prevent virtually ALL summary of benefit and comparison from being delivered in this preferred format. At a time when administrative expenses must be trimmed in order to reduce premiums, as is the intent of PPACA, this regulation will add thousands of dollars to an insurance company or TPA's overall expense. This expense will be passed along to the consumers. Please consider refining the electronic delivery requirements when issuing final regulations.

2) The interim final regulations request comments on an employer groups ability to request the Summary of Benefits and Comparison in a language other than English. This does not need to be part of the regulation issued by the Government. Most insurance companies and third party administrators would consider this offering good customer service. However, like all services there is a cost and an associate fee. Translation costs would and should be passed along to the employer group.

3) PPACA is putting considerable strain on the resources of all who offer insurance products. With this in mind, we would respectfully request reconsideration on the implementation. The window allotted due to the late issuing of the regulations will draw resources away from other regulations (such as the necessary attention to 5010 after the 1/1/11 implementation and the preparing for ICD10).

Thank you for your consideration to give us the time and opportunity to improve compliance with this new regulation.

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