

**From:** [Craig Wright](#)  
**To:** [e-ohpsca-er.ebsa@dol.gov](mailto:e-ohpsca-er.ebsa@dol.gov)  
**Subject:** RE: Guidance on 90-Day Waiting Period Limitation under Public Health Service Act § 2708  
**Date:** Friday, September 07, 2012 5:14:40 PM

---

Comment;

Most employers I know have enrollment in health plans starting the first of the month following the successful completion of 90 days of employment. 90 days is not a waiting period in business, it is a testing period to see if the hired employee will work out. The waiting period is really the time after he passes the test till the first of the next month which can vary greatly.

I doubt I am alone in pointing this out and hope something constructive can occur to make the law conform to the generally accepted and usual way of doing business.

**Craig Wright**  
Director of Corporate Affairs  
**Atkinson-Baker, Inc.**  
*America's Court Reporters*  
[cwright@depo](mailto:cwright@depo)

PI 800.288.3376 FI 800.925.5910  
[www.depo.com](http://www.depo.com)