

December 9, 1976

Re: Exemption from reporting and disclosure requirements  
for welfare plans

Dear

Thank you for your letter requesting an exemption from certain reporting and disclosure requirements of the Employee Retirement Income Security Act of 1974 (ERISA). We regret the delay in responding.

You state that (named), Inc., sponsors three employee welfare plans, all of which cover fewer than 100 participants.

Benefits are exclusively provided through insurance policies, the premiums for which are paid partly by direct contribution from the employer's general assets and partly from employee contributions. Contributions of participants are forwarded by the employer within three months of receipt. Rebates to which contributing participants are entitled are returned to them and they are informed upon entry into the plan of the provisions concerning the allocation of rebates.

You request to be exempted from filing reports with the Department of Labor, furnishing participants and beneficiaries with a summary of the annual report, plan description and technical report, and making available in the principal office of the administrator a copy of the plan description or annual report.

Based on the information you furnished us, and provided the rebates are made to plan participants within three months of receipt, the plans described in your letter qualify for the exemptions listed under §2520.104-20 of the August 15, 1975 regulations. The list contained therein encompasses all those exemptions specifically requested in your letter. We hope this information will be useful to you.

Sincerely,