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March 20, 2008

ELECTRONICALLY DELIVERED

Office of Regulations and Interpretations
Employee Benefits Security Administration
Attn: 408(b)(2) Hearing
Room N-5655
U.S. Department of Labor
200 Constitution Avenue, N.W.
Washington, D.C. 20210

Re: Request by the American Council of Life Insurers to Testify at March 31, 2008
Public Hearing on Proposed Regulations under ERISA Section 408(b)(2)

Dear Sir or Madam:

I am writing on behalf of the American Council of Life Insurers ("ACLI") to request an opportunity to testify at the March 31, 2008 public hearing on the proposed regulations under section 408(b)(2) of ERISA. It is expected that I will represent ACLI at the hearing. Walter Welch of ACLI will also be in attendance.

Attached please find an outline of the topics that ACLI intends to discuss during its testimony. The topics listed in the outline correspond to the issues discussed in ACLI's February 11, 2008 comment letter on the proposed regulations.

If any additional information is required prior to the hearing, please let us know.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Szostek", with a long horizontal flourish extending to the right.

James H. Szostek
Director, Pensions

Outline of Topics
to be Discussed by the American Council of Life Insurers
at the March 31, 2008 Public Hearing on
Proposed Regulation Under ERISA Section 408(b)(2)

1. Introduction. (1 minute)
2. Discussion of the role of insurers in providing insurance contracts to ERISA plans. (2 minutes)
3. Discussion of why the Department of Labor should address the different types of plans, e.g., health and welfare plans, on separate tracks. (2.5 minutes)
4. Discussion of the multi-state regulatory system for insurance contracts and the importance of ensuring that the disclosure requirements of the final regulation may be satisfied outside of the insurance contract. (2.5 minutes)
5. Discussion of the need for a sufficient transition to the new rules, including an effective date that is at least one year after the date the final regulations are published. (2 minutes)