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**From:** Philip Elmore [mailto:[pelmore@aresco.com](mailto:pelmore@aresco.com)]

**Sent:** Wednesday, December 27, 2006 11:14 AM

**To:** EBSA, E-ORI - EBSA

**Subject:** Form 5500 revisions

I think it would make sense for you folks to look at the filing requirements for fully insured plans that include any of the following coverages: life, death, health, dental, disability. Generally speaking, very few of these plans having less than 300 lives would be experience rated and the insuring company will require a minimum of 60% to 75% participation for the plan to remain in force.

I think there would be quite a savings in expense for you and for the employer.

Philip Elmore