

From: Harrington Jan R (HR&IS) [mailto:Jan.Harrington@buckconsultants.com]
Sent: Thursday, January 04, 2007 5:38 PM
To: EBSA, E-ORI - EBSA
Subject: EBSA Proposed Revision of Annual Return Report RIN 1210-AB14

This email presents my comments on the DOL posting in the Federal Register of December 11, 2006 pages 71562 – 71579 regarding proposed changes in to Form 5500 for the 2008 plan year.

My comments are limited to the proposed Schedule SB(Form 5500), which is intended to replace Schedule B(Form 5500) for single employer DB plans. I emphasize that my comments are personal and do not necessarily reflect the views of my employer or the actuarial bodies to which I belong. I am an enrolled actuary, a Fellow of the Society of Actuaries and a Member of the American Academy of Actuaries.

1 I suggest that item 4a should be eliminated. For any plan for which item 4 is required, this entry is identical to the entry in item 3d, column (2) Funding Target. It is unnecessary to repeat the value shown in item 3d. All required calculations can be performed using the item 3d entry rather than having a separate item 4a entry. If item 4a is eliminated, then item 4b should be renamed as item 4.

2 Item 6 is Target normal cost. There is no item for Target normal cost for at risk plans. I suggest that Item 6 be expanded to have one line for regular target normal cost and another line to show at risk target normal cost. Item 31 will need to be modified to reflect any change in item 6.

3 The Statement by Enrolled Actuary contains the words “this schedule and accompanying schedules, statements and attachments.” I recommend that these words be replaced by “this schedule and attachments.” My reasons for recommending this change are:

- “accompanying schedules” could be interpreted to mean the other Schedules attached to Form 5500, yet the enrolled actuary is not responsible for the accuracy of those other schedules and should not be required to sign attesting to their accuracy.
- the term “attachments” must include any “statements” that are attached to the Schedule B; therefore the term “statements” is tautological and should be deleted.

4 The definitions for items 7 and 8 refer to items 13 and 35 from the prior year. In order for these definitions to be valid for the 2008 form, Schedule B(Form 5500) for 2007 needs to have items 13 and 35. If Schedule B(Form 5500) for 2007 is the same structure as for 2006, then no such items will exist.

5 I suggest the words “not less than zero” be added to the end of the parenthetical definition for item 30.

Best Wishes

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