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May 3, 2010

Office of Regulations and Interpretations
Employee Benefits Security Administration
U.S. Department of Labor
200 Constitution Avenue N.W.
Room N5655

Washington, D.C. 20210

Attn: Lifetime Income RFI

Re: Request for Information Regarding Lifetime Income Options for Participants and Beneficiaries in Retirement Plans [RIN 1210-AB33]

To Whom It May Concern:

Thank you for the opportunity to comment in response to the RFI by the Department of Labor and the Department of the Treasury regarding lifetime income options in retirement plans. Weber Shandwick commends the government's interest in promoting guaranteed lifetime retirement income options for Americans, particularly in light of the recent economic downturn and resulting trends in the retirement services industry. In our view, this is a tremendously important issue and one that should be an immediate priority for both agencies.

Context for Our Point of View

As a global public relations firm, Weber Shandwick has advised leading 401(k) plan providers for the past decade and has worked extensively in the retirement services space with a specific focus on retirement income industry thought leadership initiatives and issues. We also specialize in developing integrated communications campaigns that seek to change behavior, and we've done this successfully with both private sector and government clients in recent years, including the IRS *e-file* campaign, the Earned Income Tax Credit (EITC), the Taxpayer Advocate Service (TAS), the Federal Deposit Insurance Corporation (FDIC), Go Direct/Direct Express (U.S. Treasury and Federal Reserve Bank), the United States Army and the 2010 Census.

We were particularly encouraged to see the DOL and Treasury asking for public comment on the necessity of participant education and how it should be provided. The importance of financial education was further reinforced this week by an excellent op-ed published on The Huffington Post and co-authored by U.S. Treasury Secretary Tim Geithner, U.S. Education Secretary Arne Duncan and Senior Advisor and Assistant to the President Valerie Jarrett. The piece concluded with the point that we need to provide all Americans with the financial education they need "to succeed in this increasingly complex, fast-moving economy." Weber Shandwick's experience in working at the intersection of retirement and government tells us that the best public education campaigns are grounded in research—and that they reach their intended audiences with tested messages and through multiple channels.

Primary Research: A Critical First Step

Without question, there are differences in the way various demographic groups would view lifetime income products and these must be taken into account. Age, education, income levels, race and ethnicity, gender and where people live often serve as key factors in determining how individuals prepare for

retirement. For example, Generation Y looks at retirement much differently than Generation X, and both of these generations have different priorities and views than Baby Boomers.

In order to truly understand these nuances, Weber Shandwick recommends that DOL and Treasury jointly undertake a primary research project in order to fully understand these views. We also recommend a thorough review of existing financial literacy and financial education programs currently delivered by the federal government in order to ensure coordination of efforts, eliminate duplication of efforts and maximize effectiveness. Both the primary research and relevant existing programs, in our view, should then become the foundation for a public education campaign that should reach the intended audience through multiple channels, including social media, earned media, partnering organizations, industry influencers, and participant materials. The campaign must be measured to determine its effectiveness in achieving the desired behavior changes.

Equip Employers to Be Part of the Solution

Due to our past work on financial literacy campaigns and the passage of the Pension Protection Act (PPA) in 2006, we understand that employers are key to delivering retirement income education and changing behaviors and mindsets among their employees. Weber Shandwick represented the Business Roundtable on its work with the Pension Coalition, and we know from that experience that a broad array of employer stakeholders—the American Benefits Council, The Dow Chemical Company, The Dupont Company, The ERISA Industry Committee, Financial Executives International, Ford Motor Company, General Motors Corporation, Honeywell, IBM, International Paper, John Deere, Kodak, the U.S. Chamber of Commerce and Xerox Corporation—want to be part of the solution.

As such, plan sponsors must be adequately supported in their efforts to help workers shift their mindsets from retirement savings to retirement income. In many ways, plan sponsors are as challenged by the increasingly complex economy as are their participants. They are being asked to wear many hats, to do more with less, and to provide retirement benefits to a rapidly diversifying workforce. Given these increasing demands, it is Weber Shandwick's view that any public education campaign undertaken by DOL and Treasury should include a plan sponsor component—as well as a plan participant component.

Extend Access to Americans Without an Employer-Sponsored Plan

In addition, customized outreach must be done to Americans who may lack access to employer-sponsored plans, including but not limited to small business owners, women, rural Americans, Hispanics and other race and ethnic groups who may need in-language and in-culture communication. The government should, in Weber Shandwick's view, partner with industry organizations to deliver this critical education if the employer conduit is missing. These Americans must hear messages about retirement income from "trusted voices," organizations and community leaders who have credibility with them.

In Weber Shandwick's view, lifetime income options must, whether offered or mandated, opt-in or opt-out, in-plan or out of plan, be accompanied by an integrated communications campaign for their intended audiences if they are to truly succeed in bringing about the desired behavior changes we all agree are necessary in order to achieve greater retirement security. This is a noble goal, and an achievable one, if employers and employees are surrounded with the communication and financial education they need to succeed.

Sincerely,



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