

REG-148681-09

LEGAL PROCESSING DIVISION
 PUBLICATION & REGULATIONS
 BRANCH

FEB 18 2010

PUBLIC SUBMISSION

As of: February 18, 2010
Received: February 18, 2010
Status: Posted
Posted: February 18, 2010
Tracking No. 80aa6d12
Comments Due: May 03, 2010
Submission Type: Web

Docket: IRS-2010-0006

Request for Information Regarding Lifetime Income Options for Participants & Beneficiaries in Retirement Plans

Comment On: IRS-2010-0006-0001

Request for Information Regarding Lifetime Income Options for Participants and Beneficiaries in Retirement Plans

Document: IRS-2010-0006-0027

Comment on FR Doc # 2010-02028

Submitter Information

Name: David Young

Organization: 1

General Comment

Responses to a Few Questions

Question 1 - Payments must be indexed to inflation (i.e., maintain constant purchasing power over time).

Question 2 - You've listed all the major causes. My strongest concerns are conversion cost (i.e., converting to an annuity in a low interest rate environment), plan fees and counterparty risk.

Are there steps that the Agencies could or should take to overcome at least some of the concerns that keep plan participants from requesting or electing lifetime income? Other than leaning on the Fed to stop holding interest rates artificially low, I can't think of anything.

Question 8 - One advantage - Plan sponsors can vet potential annuity providers before offering their products to employees. This may give employees greater confidence in a particular annuity seller and their products.

Question 13 - Should some form of lifetime income distribution option be required for defined contribution plans (in addition to money purchase pension plans)? Yes; however, whatever action is taken with respect to offering a lifetime income option, it must remain just that - an option.

There should be no conversion requirement imposed on defined contribution plan participants. If so, should that option be the default distribution option, and should it apply to the entire account balance? No, it should not be the default option and it should not apply to the entire balance.

To what extent would such a requirement encourage or discourage plan sponsorship? I think offering the option, and associated plan communications about this option to employees, would be sufficient.

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Comment On: IRS-2010-0006-0001

Request for Information Regarding Lifetime Income Options for Participants and Beneficiaries in Retirement Plans

Document: IRS-2010-0006-0029

Comment on FR Doc # 2010-02028

Submitter Information

Name: David Young

Organization: 2

General Comment

General Comments

- 1) The retirement security of all workers would be enhanced if government policy did not facilitate the export of US jobs. A start would be to address the mercantilist polices of our east Asia trading partners.
- 2) "Good jobs provide wages that support families, and rise with time and productivity." Odd - productivity has risen over past 10 to 20 years with no appreciable increase in inflation-adjusted wages. Perhaps DOL and Treasury should examine why this has occurred.
- 3) The Department of the Treasury could promote economic growth, stability, and economic security by stopping the direct and indirect bailouts of insolvent financial institutions.
- 4) "Employers that sponsor defined benefit pension plans are responsible for making contributions that are sufficient for funding the promised benefit, investing and managing plan assets (as fiduciaries), and bearing investment risks because the employer, as plan sponsor, is required to make enough contributions to the plan to fund benefit payments during retirement." Really? Have you looked at the health of private pension plans lately? Most company plans are woefully underfunded, do not receive sufficient periodic contributions, and assume average rates of return that are way too high. America's private (and public) pension system is a slow motion train wreck. Not surprisingly, companies have become quite adept at reducing or shedding their pension-related obligations. Just see how well the PBGC is doing.

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PUBLIC SUBMISSION

As of: February 18, 2010
Received: February 18, 2010
Status: Posted
Posted: February 18, 2010
Tracking No. 80aa7112
Comments Due: May 03, 2010
Submission Type: Web

Docket: IRS-2010-0006

Request for Information Regarding Lifetime Income Options for Participants & Beneficiaries in Retirement Plans

Comment On: IRS-2010-0006-0001

Request for Information Regarding Lifetime Income Options for Participants and Beneficiaries in Retirement Plans

Document: IRS-2010-0006-0028

Comment on FR Doc # 2010-02028

Submitter Information

Name: David Young**Organization:** 3

General Comment

I do have a suggestion that I think would improve all defined contribution plans - it should be required that plan sponsors offer direct access to US government securities (i.e., not through a mutual fund or similar vehicle). Specifically, plan participants should be able to bid on (i.e., buy) treasury bills, notes and bonds when they are auctioned. These purchases should be allowed on a fee-free basis. Large investment management firms already offer this service to their IRA customers (see Vanguard and Fidelity as examples).