

# PUBLIC SUBMISSION

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**Docket:** EBSA-2015-0017

Claims Procedure for Plans Providing Disability Benefits; Extension of Applicability Date

**Comment On:** EBSA-2015-0017-0291

Claims Procedure: Plans Providing Disability Benefits

**Document:** EBSA-2015-0017-DRAFT-0370

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## Submitter Information

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## General Comment

Dear Sir or Madam:

I am writing to object to the proposed delay in implementing the final claims processing regulations. The regulations were adopted after an extensive notice and comment period, and among the many comments submitted were comments from the industry that already addressed the issues that DOL now suggests require further comment.

Moreover, I gather from media reports that the reason for the proposed delay has not been publicized. That is, in itself, problematic. Our federal regulatory process is not supposed to be conducted in secret. Certainly, the DOL statement that some "stakeholders" and members of Congress have concerns about them is not in itself a

sufficient basis to delay their implementation. These same "stakeholders" and members of Congress had ample opportunity to comment during the original review and comment period.

Finally, are not the plan participants whose benefits are at issue also "stakeholders?" Yet it is these individuals who will suffer the most if the regulations are delayed.

Please contact me if I can provide additional information. Thank you.