

# 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

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## General Comment

Dear Mr. Hauser,

I understand the DOL is in a constant balancing act between protecting plan beneficiaries and the cost of providing insurance coverage by employers/insurers. The final ERISA claims regs adopted Dec. 19, 2016 continue to be contested by the insurance carriers despite their participation in the comment period under the APA. A premium increase study will undoubtable show its intended objective and conclude premiums will go up and certain employers will have to drop coverages. That hymn is all too familiar. The disability carriers have enjoyed steady market cap increase so please implement the regulations to effectuate the benefit to plan participants/beneficiaries.

As an attorney familiar with contested claims for benefits I'm confident that carriers

will continue to demonstrate healthy returns and employers will continue to provide coverage to their employees.