

From: Amar Raval [mailto:araval@bergplummer.com]
Sent: Tuesday, October 24, 2017 12:49 PM
To: EBSA, E-ORI - EBSA
Subject: In Re: RIN 1210-AB39

Dear Department of Labor,

I am writing regarding the supposed need to delay regulations that were set to be implemented by the DOL. As an ERISA practitioner who represents individuals against insurance companies, there is an urgent need to implement the regulations without further delay. The DOL already addressed all concerns regarding the supposed need for the delay. Insurance companies and plans had plenty of time to make their case. The rule making process closed. Why should we give them yet more deference?

Second, the DOL evaluated the purported cost increases now raised by plans and insurance companies and concluded that the costs would be minimal. Those are research based conclusions, not “the sky is falling” fears that insurance companies seemingly always raise to justify their nefarious ends.

Third, after careful consideration listening to insurance companies, plans, and claimants, the DOL implemented well-thought out regulations. Why delay implementing them now? The process worked. The system worked. Why not finalize things?

Yet Still I Remain,



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