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**Sent:** Tuesday, October 24, 2017 12:56 PM  
**To:** EBSA, E-ORI - EBSA  
**Subject:** RIN 1210-AB39

To Whom This May Concern:

The purpose of this e-mail is to briefly comment on the proposed 90 day delay to the applicability of the Final Rule amending the claims procedure requirements applicable to ERISA-covered employee benefit plans that provide disability benefits. The 90 day implementation delay is not warranted because the insurance industry and plan administrators had the opportunity to provide input into the regulations during the comment period. The decision making process is now closed and the DOL has produced well-reasoned regulations. While the insurance industry and plan administrators may not agree with all of the changes to the regulations their time to provide input has passed. It is not fair to ask participants and beneficiaries to wait another 90 days to implement the current rules regulations and effectively give the insurers another comment period. The new regulations will benefit plan participants and beneficiaries who have patiently, and in accordance with the process, waited through the comment and rules issuing procedures. The participants and beneficiaries of plans now deserve the effects of the changes to the final rules and regulations immediately.

Thank you for your consideration,

*Paulette Adams Bradham*

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