

From: Elizabeth Green [mailto:EGreen@kantorlaw.net]
Sent: Wednesday, October 25, 2017 2:04 PM
To: EBSA, E-ORI - EBSA
Subject: Comment on RIN 1210-AB39

Dear Deputy Assistant Secretary Hauser,

I am writing in regarding RIN 1210-AB39 and Claims Procedure Regulations for Plans Providing Disability Benefits Examination. These regulations are of great concern for me as I am an attorney representing disabled clients who rely on the regulations to ensure a full and fair review of the benefit determinations for disability benefits.

There is no reason for a further delay in implementing the final regulations. Disabled claimants depend on these regulations and this delay is inexcusable. The insurance industry and benefit plans contends that there were cost issues. Not so. There is not data supporting any issues with cost. ***The only cost at issue are the savings gained by the insurance company by further delay.***

Moreover, there is a lack of transparency in this entire process which raises serious concerns as to the real motivations behind the delay. There was a notice and comment period and if there is any other information collected that pertains to notice and comment, it should be disclosed so that participants can evaluate it.

I request that the effective date of the regulations is not further delayed because there is no valid reason for such a delay. Please adhere to the rule-making process.

Thank you for your consideration of these comments.

Elizabeth K. Green, Esq.
Kantor & Kantor LLP
19839 Nordhoff Street
Northridge, CA 91324
Tel (818) 886-2525
Fax (818) 350-6267
Email egreen@kantorlaw.net