

# 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-0390

Comment on FR Doc # 2017-22082

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## Submitter Information

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## General Comment

I am an attorney with more than 25 years experience with the DOL's regulations promulgated under ERISA. I urge the Department to implement the new regulations without delay. The new regulations bring additional clarity to the claims process that in practice will likely simplify and cut costs for all parties to the process and has the potential to avoid or streamline litigation.

The Department evaluated carefully the regulations and took input from all "stakeholders." It concluded, quite properly, that any additional costs involved would be minimal and more than justified. There is no principled basis for delay or reconsideration of the new regulations.

Thank you for your consideration