

From: Jeremy Bordelon [mailto:jeremy@evergreendisability.com]
Sent: Thursday, October 26, 2017 9:03 PM
To: EBSA, E-ORI - EBSA
Subject: RIN 1210-AB39

I write to oppose any changes or further delays to the previously-adopted changes to the ERISA claims regulations. The Department has already addressed all of the concerns raised in the notice of this delay. The comment period from before these regulations was adopted was ample for stakeholders from the insurance side to voice their concerns, and they did so. Those concerns were heard, as were the comments from the claimants' side. With both sides having been heard, the rulemaking process closed, and the regulations now being questioned were adopted. They have not even taken effect yet, so it is not clear how any "new data" could possibly exist that would support delaying implementation of these regulations.

As for the supposed cost of these new rules on insurers, the Department already evaluated those purported cost increases and concluded they would be minimal, if any. The insurers were heard, and the Department considered their comments, and implemented implemented well-thought out regulations. These regulations will put into effect changes that will result in less litigation over denied claims, and they should be left in place and put into effect immediately.

Respectfully,

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