

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

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Submitter Information

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General Comment

I am troubled by the proposed delay in the final regulations. The Department arrived at the final rules after a full and thorough notice and comment. The speculative industry comments were considered as part of the process, as was the request for delay. Delay at this stage, on the basis of confidential and "second-bite-at-the-apple" behavior is improper.

Any potential rise in premiums--a proposition that is, again, purely speculative--would be fully offset by the increase in value of the benefits ERISA participants would experience.

Delay is unnecessary and improper.

Thank you.