As an attorney working in the field of ERISA benefit disputes, I am writing to oppose the delay in the implementation of the Final Rule regarding claims procedure requirements for disability benefits.

The Final Rule is a valuable update to the ERISA regulations that ensures claimants receive fair treatment from plan administrators. The Department of Labor has already undergone a lengthy review process that took into consideration all arguments for and against the Final Rule, including the costs associated with it, which would be minimal. Indeed, the new Rule will hopefully reduce costs by clarifying the rights and duties of those involved in the benefit claim process.

I see no principled reason to delay the implementation of the Rule. The concerns that have been cited as a purported reason to postpone the Rule's implementation have already been fully vetted.