

**From:** Philip G. Fairbanks [mailto:[pgf@austinmehr.com](mailto:pgf@austinmehr.com)]  
**Sent:** Friday, October 27, 2017 9:09 AM  
**To:** EBSA, E-ORI - EBSA  
**Subject:** RIN 1210-AB39 - ERISA regulations

Dear Deputy Assistant Secretary Hauser-

I am writing to request that you not delay the implementation of the changes to the regulations contained at 29 CFR 2560.503.1. I understand that there is a proposed delay in the final regulations due to additional comments made by insurers and plans.

There already was an extensive notice and comment period that allowed for all interested parties, including insurers and plans, to provide whatever information they deemed relevant to the proposed changes to the regulations. It is unclear why the normal rule-making procedure is not being followed and why comments are being considered beyond the notice and comment period. The Department has already analyzed and has given careful consideration to the concerns and comments generated during the public comment period.

Thank you for your consideration.

Philip G. Fairbanks



**MEHR, FAIRBANKS & PETERSON**  
T R I A L   &   L A W Y E R S

201 West Short Street, Suite 800, Lexington, KY 40507 • Phone: (859) 225-3731 • Fax: (859) 225-3830

[pgf@austinmehr.com](mailto:pgf@austinmehr.com)

This electronic mail transmission from Mehr Fairbanks & Peterson Trial Lawyers may constitute an attorney-client communication that is privileged at law. It is not intended for transmission to, or receipt by, any unauthorized persons. If you have received this electronic mail transmission in error, please delete it from your system without copying it, and notify the sender by reply e-mail, so that our address record can be corrected.