

503.620.5577 T
503.670.7683 F
ralph@wiserlaw.com

RALPH E. WISER

Attorney at Law

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via email only: e-ORI@dol.gov

Office of Regulations and Interpretations
Employee Benefits Security Administration
Room M-5655
U.S. Dept. of Labor
200 Constitution Avenue NW
Washington, D.C. 20210

Re: Claims Proc. Regs. for Plans Providing Disability Benefits
RIN No. 1210-AB39
Regulation: 29 C.F.R. §2560.503-1

Dear Deputy Assistant Secretary Houser:

I represent individuals in their claims for disability benefits under ERISA-governed plans from initial claim filing to the ultimate disposition of their claim in court. I am concerned about the Department's proposed delay of the adoption of final regulations. My understanding is that the Department has engaged in extensive investigation of the utility of the regulations and has received comments from all stakeholders. However, it now appears that the Department may be entertaining comments and agenda-driven requests that have not been disclosed to all stakeholders, held up to the scrutiny of all stakeholders, and may be given undue and unfair consideration.

The Department has already engaged in extensive investigation of the rules and received information from all stakeholders. There is no principled reason to delay adoption of final regulations.

Sincerely,

Ralph E. Wiser