



Debra Conner
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12/11/17

Submitted electronically via e-ORI@dol.gov

Mr. Timothy Hauser
Acting Assistant Secretary of Labor
Employee Benefits Security Administration
Room N-5655
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, D.C. 20210

Re: Claims Procedure for Plans Providing Disability Benefits; Extension of Applicability Date (RIN 1210-AB39)

Dear Acting Assistant Secretary Hauser:

On behalf of Sun Life Financial, we appreciate the opportunity to provide the Department with our comments in regards to the review of the rule amending disability claims procedures (81 Fed Reg. 92316 (Dec. 16, 2016))(the "Regulation") under the Employee Retirement Income Security Act of 1974 ("ERISA").

Sun Life strongly supports the Department's work to re-examine the amended disability claims procedures and we appreciate the Department's willingness to review additional industry information to better understand how the amended disability claims procedures could negatively impact claimants and policyholders.

Sun Life participated in the American Council of Life Insurers (ACLI) industry survey that provides the Department with the data you had requested. This data is included with ACLI's comment letter.

We ask that the Department thoroughly review this information, and specifically ask that the Department note the percentage of claims that the industry approves, the percentage of claims that are denied, and the percentage of those denials that are ultimately approved through the current appeals process.

These figures demonstrate that the current ERISA disability claim procedures provide a level playing field for disability claimants, and provide disability claimants with a fair and impartial appeals process.

We also ask that the Department note that based on the estimated costs to implement these new regulations, costs that will result in the price of disability insurance increasing, and the estimated elasticity of demand for disability insurance, this regulation will ultimately lead to fewer Americans purchasing disability insurance.

It should also be noted that while costs for disability insurance will increase and demand for disability insurance will decrease, the ACLI survey found that very few, if any, disability claims that would have been denied under the current disability claims procedures will now be approved based on the amended disability claims procedures.

We thank the Department for their willingness to delay and review these new regulations, and look forward to continuing the dialogue on this important matter.

Sincerely,

A handwritten signature in black ink that reads "Debra A. Conner". The signature is written in a cursive, flowing style.

Debra Conner
VP, Group Disability & Voluntary Claims
Sun Life Financial U.S.