

REG-118412-10

AUG 5 2010

PUBLIC SUBMISSION

As of: August 05, 2010
Received: August 04, 2010
Status: Posted
Posted: August 05, 2010
Tracking No. 80b29014
Comments Due: August 16, 2010
Submission Type: Web

Docket: IRS-2010-0010

Group Health Plans and Health Insurance Coverage Rules Relating to Status as a Grandfathered Health Plan Under the Patient Protection and Affordable Care Act

Comment On: IRS-2010-0010-0001

Group Health Plans and Health Insurance Coverage: Interim Final Rules for Relating to Status as a Grandfathered Health Plan under the Patient Protection and Affordable Care Act

Document: IRS-2010-0010-0019

Comment on FR Doc # 2010-14488

Submitter Information

Name: Joseph Polanco**Address:**

1349 Empire Central, Suite 220
Dallas, TX, 75247

Email: joep@piamidam.org**Phone:** 214-630-8871**Fax:** 214-688-1767**Organization:** PIA MidAmerica

General Comment

As a small business, and trade association representing small business, we very concerned about the Grandfathering aspects of the legislation. We are already seeing carriers increasing rates by double digits -- and in instances like ours over 40%. Consequently, firms are forced to change coverages and cost sharing; otherwise we will not be able to operate profitably and take care of our customers -- and maintain our employment base.

In this environment of escalating medical costs, as well as carriers aggressively re-pricing, it's not realistic to assume that small business will be able to take advantage of any grandfathering.