
From: McDonald, James [mailto:James.McDonald@meijer.com]
Sent: Sunday, April 10, 2011 10:51 AM
To: EBSA, E-ORI - EBSA
Subject: RE: DOL seeking comments on electronic disclosure

First, I think we should be honest with ourselves and admit that probably less than 10% ever read the disclosed information. Most people would prefer to pick up the phone and call a Human Resources Contact Center or third party provider and get the information from someone than to spend time reading "legal documents" that they don't understand and can't find what they're looking for. Second, companies waste thousands of dollars each year sending out these disclosures that end up in the trash (large percent of the time) when they could access online or call the HR Contact Center or third party provider and have the information explained to them (which they would prefer) or sent by mail to them. Last, companies should be able to provide access online or by mail to employees. Whether the employees has access to a computer shouldn't matter since these employees can call (800 number) and have the information they are requesting explained to them or mailed to them. This is no different than enrollments for 401(k) plans or Health & Welfare plans. Many large employers don't allow paper today and ALL employees must enroll online or call the HR Contact Center and/or third party provider.

Soon, the government will not provide paper check for Social Security payments and many employers today don't provide hard copy paychecks to employees. Let's move forward and STOP requiring employers to provide paper disclosures for employee benefit plans. Again, just because some employees don't have access to a computer shouldn't limit our ability to provide these disclosures without mailing to ALL employees. Employees without access can always pick up the phone and call get answers or request a hard copy. Additionally, there would be a better documentation of request than just sending out each year by paper.

Changes is needed and needed now!

Thanks,

Jim McDonald
616-295-8464

News Release

EBSA News Release: [04/06/2011]
Contact Name: Mike Trupo or Jason Surbey
Phone Number: (202) 693-3414 or x4668
Release Number: 11-0483-NAT

US Labor Department seeks public comments on electronic disclosure by employee benefit plans

WASHINGTON — The U.S. Department of Labor today announced it is soliciting public comments to assist in determining whether and possibly how to expand or modify current rules regarding the electronic distribution of employee benefit plan information.

Plan information, such as quarterly account statements, is required to be disclosed under the Employee Retirement Income Security Act, which is enforced by the department's Employee Benefits Security Administration.

"Some workers and retirees may not be sufficiently computer literate to receive information electronically or have reasonable access to the Internet, and others may simply prefer traditional paper disclosure," said Assistant Secretary of Labor for EBSA Phyllis C. Borzi. "But in some instances, electronic disclosure may be just as effective as paper-based communications and could save employers and service providers money. We look forward to reviewing all the comments we receive on these and the other issues raised in the request for information."

The Labor Department's request for information sets forth 30 specific questions on a broad range of topics related to electronic distribution of benefit plan information. The department hopes to hear from plan participants and beneficiaries; employers and other plan sponsors; plan administrators; plan service providers; health insurance issuers; members of the financial community; and the general public. In addition to responding to specific questions contained in the request for information, interested parties are encouraged to address any other relevant matters.

The request for information will be published in the *Federal Register* on April 7 and can be viewed at <http://s.dol.gov/E2>. Comments are due by June 6.

Written comments may be addressed to the U.S. Department of Labor, Office of Regulations and Interpretations, Employee Benefits Security Administration, Room N-5655, 200 Constitution Ave. NW, Washington, D.C. 20210, Attn: Electronic Disclosure by Employee Benefit Plans RFI. The public also may submit comments by email to E-ORI@dol.gov or through the federal e-rulemaking portal at <http://www.regulations.gov>.

NOTE: This electronic message and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this message in error, any unauthorized review, use, disclosure, distribution or copying of this message is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message. Unless expressly stated in this e-mail, nothing in this message should be construed as a digital or electronic signature or writing.