

From: [Soroosh, Bob](#)
To: [E-OHPSCA2715.EBSA](#)
Cc: [Soroosh, Bob](#); [Kelley, Sue J](#); [McKendry, Theresa](#); sbeeken@GAIC.com; martin.storey@us.michelin.com; gbacher@ahip.org
Subject: Comment on Template for Proposed Uniform Summary of Benefits
Date: Thursday, August 18, 2011 3:14:08 PM

Dear DOL -

This comment is regarding the proposed Uniform Summary of Benefits to take effect March 2012:

Our company (approximately 3,000 USA employees) has been on a "full replacement" or "total replacement" CDHP (consumer-driven health plan) with a "roll-over" HRA (health reimbursement account) since 1-Jan-2004. During the period of 2004 through/including 2011, about 75% of our employees have accumulated a "rolled-over" HRA balance that will be added to their new annual 2012 HRA amount. Said differently, each employee's 2012 HRA balance is the sum of the new 2012 HRA amount plus the accumulated HRA balance rolled over for the prior eight years. Since each employee's accumulated HRA balance depends on his or her medical and drug expenses for the prior eight years, each person's new total 2012 HRA balance will be different (except for new employees starting from zero).

This variable HRA account balance makes it impossible to state with precision what an employee's out-of-pocket medical and drug expenses will be in 2012. For the large number of our employees who will start 2012 with an accumulated HRA account balance that is greater than their 2012 single-year out-of-pocket maximum -- any such employee who in 2012 has childbirth, breast cancer, or diabetes would have ZERO 2012 out-of-pocket expense (if in network), since their entire 2012 calendar year out-of-pocket expense will be off-set by the accumulated HRA balance rolled over from prior years.

Since there are millions of employees in the USA covered under similar CDHP plans with roll-over HRA accounts, you may assume that there are other employers besides Affinia Group that may find it difficult to provide a precise calculation of out-of-pocket expense as seems to be required by the proposed new Summary of Benefits.

Thanks for your consideration of this comment,
Bob Soroosh, Director of Benefit Administration
Affinia Group Inc., Ann Arbor, MI
ph: 734-827-5453

NOTICE: This communication may contain privileged or other confidential information. If you have received it in error, please advise sender by reply email and immediately delete the message and the attachments without saving, copying or otherwise disclosing the content. Thank you.