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**To:** [E-OHPSCA2715.EBSA](#)  
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Just one comment - Requiring 60 days advance delivery of the SBC will adversely affect both employer and insurer. When an employer receives a price increase at renewal, the process for the next steps can often consume 60 days on it's own. If the employer decides to market the coverage to other insurers, depending on the size and complexity of the employer plan(s), the process of obtaining quotations can often take 4 weeks or more. The bottom line here is that if an employer bring competition into the process, they will be forced to change their Open Enrollment period and Plan Anniversary potentially every year.

Our Plan Anniversary is 4/1/12, and our insurer advised us that we would have to provide confirmation of any plan change by 1/12/12 so that the SBC can be prepared. If we can't make up our minds by that date, then we need to make the change later in the year. Changing deductibles while changing the deductible accumulation period will create nothing but problems.

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