

December 5, 2016

SUBMITTED ELECTRONICALLY

The Honorable Phyllis C. Borzi  
Employee Benefits Security Administration  
U.S. Department of Labor  
200 Constitution Avenue, NW  
Washington, DC 20210

**RE: RIN 1210-AB63 - Annual Reporting and Disclosure Proposed Rule**

Dear Assistant Secretary Borzi:

On behalf of Delta Dental of California (“Delta Dental”) we are writing to offer comments in response to the Department of Labor’s (DOL) Notice of Proposed Rulemaking entitled “Annual Reporting and Disclosure” that was issued on July 21, 2016. We are a member of the Delta Dental Plans Association (DDPA), the national association of Delta Dental member companies which together provide 74 million Americans with trusted access to oral health care. We are also a member of the National Association of Dental Plans (NADP), the largest non-profit, national trade association focused exclusively on the entire dental benefits industry and whose mission is to promote and advance the dental benefits industry to improve consumer access to affordable, quality dental care.

Based upon our review of the proposed rules and revisions to existing reporting standards, Delta Dental has significant concerns with the far-reaching scope of the NPRMs’ data collection proposal on group health plans and the excessive burden it will impose on Stand-Alone Dental Plans (SADPs) and their small group market consumers. Further, SADPs have limited access to much of the information sought in the new Schedule J due to their narrow scope and traditional excepted benefit status. With these overarching comments in mind, Delta Dental aligns itself with the detailed comments that are concurrently being submitted by DDPA and NADP.

We appreciate the opportunity to provide feedback on these important issues. Please do not hesitate to contact me at [jalbum@delta.org](mailto:jalbum@delta.org) or by phone at 415-972-8418 if you have any questions.

Sincerely,



Jeff Album  
Vice President, Public & Government Affairs

Delta Dental of California  
Headquarters:  
100 First Street  
San Francisco, CA 94105  
Telephone: 415-972-8300

Southern California  
Sales:  
17871 Park Plaza Drive  
Suite 200  
Cerritos, CA 90703  
Telephone: 562-403-4040

Commercial Programs  
Claims Processing  
Customer Service:  
P.O. Box 997330  
Sacramento, CA 95899-7330

Offices in:  
Cerritos, Fresno,  
Rancho Cordova,  
San Diego and  
San Francisco