



THE PENSION DESIGN GROUP

December 5, 2016

Office of Regulations and Interpretations
Employee Benefits Security Administration
U.S. Department of Labor
200 Constitution Avenue, N.W., Room N-5655
Washington, D.C. 20210

Re: Proposed Revision of Annual Information Return/Reports (Form 5500 Series) - RIN
1210-AB63

Pension Design Group is a retirement plan consulting firm. We service the retirement plans of over 300 plans primarily in a tri-state area.

One of our services is the preparation and filing of Form 5500 (or Form 5500-SF for small plans). In that capacity, we have serious issues with the additional data requirements contained in Proposed Revisions (the "Proposal") to Forms 5500 and 5500-SF, as follows:

1. The Proposal will result in a substantial increase in both data gathering and form preparation time. Most of our clients' plans are small plans and in this segment of the market, increased plan operating expenses are borne by plan participants and beneficiaries through the plan.
2. Our firm would be considered a small business - we employ 12 employees. We do not have the time or budget to instantly redesign processes and systems to capture data that has never before been required to be reported. Our software provider would need time to design the software to accommodate this data. We would need time to implement and create procedures for capturing that data and including it in their software. There should be sufficient implementation time provided (24-36 months from the publication of final versions of the forms and instructions to the first day of the first plan year to be reported on the new forms).
3. We are quite concerned about the inclusion of the preparer information being available on a public website. While we have no problem making this information available to IRS or the Department of Labor for their use, we have a serious problem with our client list being made available to the public. EFAST2 (the electronic filing system for the 5500 series) has the ability to collect data but also to suppress certain data elements from public disclosure. This would be an easy fix.

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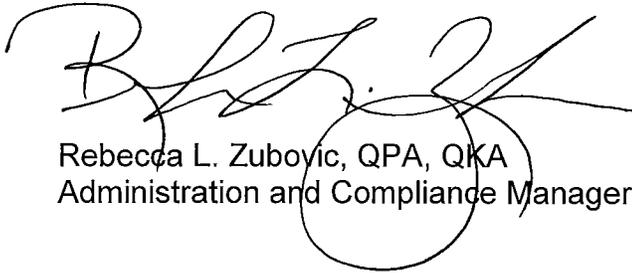
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Based on the concerns outlined above, we request that DOL do the following:

- 1. Involve industry stakeholders in the design and implementation of a project of this magnitude, (plan sponsors, service providers and plan participant representatives) so that a common-sense and cost-effective approach can be used to gather additional data.**
- 2. Eliminate the public disclosure of preparer information, so that our firm can remain in business providing quality service to our clients and so our employees will have jobs and so that businesses that undertake the risk and expense of sponsoring a retirement plan are not subjected to additional marketing and cold-calling (as a reward) for sponsoring a company plan.**

Thank you for your consideration of these comments. If you have any questions, please contact me.

Sincerely

A handwritten signature in black ink, appearing to read 'R. Zuboyic', with a large circular flourish underneath.

Rebecca L. Zuboyic, QPA, QKA
Administration and Compliance Manager