

# PUBLIC SUBMISSION

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**Docket:** EBSA-2018-0001

Definition of Employer Under Section 3(5) of ERISA-Association Health Plans

**Comment On:** EBSA-2018-0001-0001

Definition of Employer Under Section 3(5) of ERISA-Association Health Plans

**Document:** EBSA-2018-0001-DRAFT-0046

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## General Comment

It would seem that the proposed rule change, changing the definition of employer, to allow professional independent contractors, such as REALTORS, to join large multi-employer employee benefit plans would be similar to the way labor unions handle group insurance plans. And that would be a good thing.