



August 16, 2023

**RE: 2023 Advisory Council on Employee Welfare and Pension Benefit Plans  
Recordkeeping in the Electronic Age**

I am grateful for the invitation to address the ERISA Advisory Council regarding the issue of employee benefit plans' shift to digital recordkeeping and the potential implications it might hold for our industry. I submit this letter in advance to give insight to the issues I will address during my August 29, 2023 oral presentation.

To begin, I will reflect upon the importance of records. By drawing from real-life observations of actual retirement plans, I aim to shed light on the critical need for accuracy, timeliness and availability of records. Next, my focus will shift to real-life service agreement observations related to the accessibility of records in the digital age. I will conclude my oral remarks by addressing responsibility of record management and sharing a recommendation with the Council.

**Outline of Oral Remarks**

- Introduction
- Emphasizing the importance of records in the retirement plan industry.
- Real-life observations from actual plans. This will include common issues plans face as a result of a recordkeeper transition.
- Real-life observations from recordkeeper service agreements. This will address observations from recordkeeper service agreements related to record accessibility.
- Address actual responsibilities of record management and common beliefs.
- Concluding remarks

I look forward to my time with the Council.

Sincerely,

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