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From: Cheryl Minks [cminks@davidmartinagency.com]
Sent: Monday, July 28, 2003 2:59 PM
To: e-ori@dol.gov
Subject: Proposed COBRA Regulations - Comments

Department of Labor;

As a benefit consultant, I work with many employers of varying sizes. It is my experience that employers are still struggling with COBRA compliance in general and while the additional guidance under the proposed regulations is welcome the proposed effective date of January 1, 2004 will not give plan administrators enough time to interpret and make the necessary changes in their initial notice forms and especially the notice procedures. Please consider the later of April 1, 2004, or nine months after the date the final regulations are promulgated.

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