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AMERICAN SOCIETY OF PENSION PROFESSIONALS & ACTUARIES 4245 N. Fairfax Drive, Ste 750 Arlington, VA 22203

*By email to*: <u>e-ORI@dol.gov</u>

June 14, 2011

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

> Re: RIN 1210-AB50, Request for Information Regarding Electronic Disclosure by Employee Benefit Plans

Peter Swire and Kenesa Ahmad wrote a white paper "Delivering ERISA Disclosure for Defined Contribution Plans: Why the Time Has Come to Prefer Electronic Delivery," which they submitted to the Department today. ASPPA and ICI ask that the Department consider the paper as a supplement to the comment letters each organization filed on June 6, 2011. Attached is a copy of the White Paper.

Sincerely,

INVESTMENT COMPANY INSTITUTE

/s/ Mary S. Podesta

Mary S. Podesta Senior Counsel – Pension Regulation AMERICAN SOCIETY OF PENSION PROFESSIONALS & ACTUARIES

/s/ Brian H. Graff

Brian H. Graff, Esq., APM Executive Director/CEO

ATTACHMENT

cc: Joe Canary, Acting Director, Office of Regulations and Interpretations