

Tax-Sheltered Annuity Partnership for Compliance

December 3, 1999

Ms. Carol D. Gold
Internal Revenue Service
POB 7604, Room 5228
Ben Franklin Station
Washington, D.C. 20004

Re: Tax-Sheltered Annuity Partnership for Compliance

Dear Ms. Gold:

ASPPA is a national organization of approximately 3,700 members who provide actuarial, consulting, administrative, legal and other professional services for about one-third of the qualified retirement plans in the United States, the majority of which are maintained by small businesses. ASPPA's mission is to educate pension actuaries, consultants, administrators, and other benefits professionals and to preserve and enhance the private retirement system as part of the development of a cohesive and coherent national retirement income policy.

ASPPA commends the Service for its initiation of the Section 403(b) Tax-Sheltered Annuity Partnership for Compliance Program (the "Program"). ASPPA believes that the Program will significantly increase both the understanding of and compliance with the rules that apply to Internal Revenue Code Section 403(b) tax-sheltered annuity arrangements.

ASPPA wishes to work together with the Service in providing educational and outreach services under the Program. ASPPA believes that the success of past ASPPA-Service collaborations such as the annual Los Angeles Benefits Conference, demonstrates that the benefits community is both highly receptive to and gains much from programs in which both governmental and private practitioners participate.

Also, ASPPA believes that its participation in the Program will enable the Service to take into account 403(b) arrangement compliance concerns and difficulties encountered by practitioners and their clients, and help to assure the Program's recipients that the Program has both the support and input of private practitioners. Also, as you know, ASPPA maintains a Tax-Exempt and Governmental Plans Committee, which for several years has interfaced with and offered input to the Service on issues, guidance and compliance programs affecting 403(b) arrangements.

Examples of possible ways ASPPA or its members may participate in the Program include the following:

- Assisting the Service in obtaining article placements in newsletters and other publications, and writing articles or co-writing such articles with Service representatives.
- Serving as co-panelists or co-speakers with Service representatives in panel discussions, training sessions and other presentations.
- Assisting the Service in obtaining forums and venues for panel discussions, presentations and training sessions.
- Promoting the availability of the program to organizations which sponsor 403(b) arrangements, vendors of 403(b) annuities and custodial accounts and 403(b) arrangement service-providers.

We appreciate the opportunity to provide these comments, and we look forward to discussing this matter with you further.

Very truly yours,

Theresa Lensander, C.P.C., Q.P.A.,
Chair

Amiram J. Givon, Esq., Vice-Chair

Tax-Exempt and Governmental Plans
Committee

Brian Graff, Esq.
ASPPA Executive Director

Craig Hoffman, APM, Co-Chair
ASPPA Government Affairs Committee

Tax-Exempt and Governmental Plans
Committee

Bruce L. Ashton, APM, Co-Chair
ASPPA Government Affairs Committee

R. Bradford Huss, APM, Co-Chair
ASPPA Government Affairs Committee

cc: Robert J. Architect
Ms. Rosamond Ferber