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To: EBSA, E-ORI - EBSA

Subject: 408(b)(2) Hearing on Fee Disclosures to Welfare Benefit Plans

The Council of Insurance Agents and Brokers requests the opportunity to testify at the hearing on December 7, 2010, at 9:00 am, regarding issues related to the disclosures of fees, conflict of interest and other information by service providers to group health, disability, severance and other employee welfare benefit plans under section 408(b)(2) of the Employee Retirement Income Security Act. An outline of our proposed testimony may be found below. Please feel free to contact me with any questions you may have.

Sincerely,
Nicole Allen

1. I. Introduction to The Council and Its Mission (2 minutes)

2. II. Insurance Brokerage Industry in the Context of Welfare Benefit Plans (4 minutes)
 1. A. Description of Industry
 2. B. Description of Contracting
 3. C. Description of Compensation
 4. D. Existing Disclosure Regime

3. III. Regulations Are Unnecessary for/Inconsistent with Insurance Brokerage Industry (4 minutes)

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