

Filed Electronically

September 8, 2008

EBSA-2008-0010  
Office of Regulations and Interpretations,  
Employee Benefits Security Administration,  
Attn: Participant Fee Disclosure Project,  
RoomN-5655,  
U.S. Department of Labor,  
200 Constitution Avenue, N.W.,  
Washington, DC 20210

Re: EBSA-2008-0010, Fiduciary Requirements for Disclosure in  
Participant-Directed Individual Account Plans; Proposed Rule

Dear Sir or Madam:

WorldatWork appreciates the opportunity to comment on the proposed regulations concerning the Fiduciary Requirements for Disclosure in Participant-Directed Individual Account Plans.

WorldatWork is an association of human resource professionals from Fortune 500 and other leading organizations worldwide focused on attracting, motivating and retaining employees. Founded in 1955, WorldatWork provides training and education in total rewards, including compensation, benefits, work-life, recognition, and career development. WorldatWork has 30,000 members and professionals in 75 countries. A combined 44 percent of our members describe themselves as “executive” or “senior” level, and another 42 percent report that they are “mid” level in their career. Sixty-one percent of our members have 10 or more years of experience in human resources functions.

WorldatWork represents practitioners of Fortune 500 companies who offer 401(K) and other DC plans. According to a WorldatWork March 2003 survey *401(k) and Employer-Sponsored Retirement Plans*, over 90% offer 401 (k) type plans.

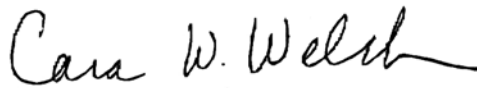
In August 2008, WorldatWork conducted an informal request for feedback on the proposed rule, which revealed that most respondents favor the proposed changes. Participants are in strong agreement with the types of information required for disclosure under the proposed rule, as well as the comparative format that would be required for fee and plan type information. Those who

shared feedback with WorldatWork were split however on whether January 1, 2009 is a reasonable effective date for any approved changes.

WorldatWork urges the Department of Labor to move quickly to promptly issue guidance clarifying that plans may rely on a reasonable, good faith interpretation pending the effective date of final regulations.

Again, on behalf of our membership, thank you for this opportunity to comment on the proposed regulations. We would be happy to provide additional input if called upon, and/or survey our membership on any specific issues associated with the regulations.

Sincerely,

A handwritten signature in black ink that reads "Cara W. Welch". The signature is fluid and cursive, with a long horizontal flourish at the end.

Cara Woodson Welch, Esq.  
Director, Public Policy  
WorldatWork