



March 20, 2008

U.S. Department of Labor
Employee Benefits Security Administration, Office of Regulations and Interpretations
200 Constitution Avenue, NW
Washington, DC 20210

Re. PROPOSED DOL REGULATION - 29 CFR PART 2550

To whom it may concern:

The Self-Insurance Institute of America (SIIA), formally requests the opportunity to have SIIA member Ashley Gillihan, present testimony on the Department's proposed regulation under Section 408(b)(2) of ERISA at the scheduled hearing, March 31, 2008. Mr. Gillihan will present his comments in the allotted ten minutes of time.

Outline of topics to be discussed:

- Discuss the need for additional clarification regarding the definition and scope of "compensation and fees".
- Concern that disclosures would be more burdensome for self-insured sponsors/plans.
 - a. Including the difference in plan-based commissions by self-insured and fully-insured plans.
 - b. Potential of fully-insured plans to not be required to disclosure "contingent commissions".
- Proposed revised definition of compensation and fees.