

From: Kim Hjort [khjort@watkinsross.com]
Sent: Wednesday, May 05, 2004 10:49 AM
To: EFAST2@dol.gov
Cc: Cheryl Gabriel; Christina Salacina; Chris Veenstra; Eric Cerling; Rick Zweering
Subject: Comments on Proposed Changes to the EFAST

To Whom It May Concern:

At Watkins, Ross & Co., we are interested in electronically filing the 5500 for our clients, but have not embraced the current electronic filing system for several reasons. These reasons include:

- We are not currently responsible for signing the filings and do not wish to take on this responsibility.
- Often, multiple parties are involved with completing various portions of the forms (for example, the auditor's report and related attachments are typically added to the form after we have completed our part in the process). The current E-Filing process is not conducive to this.
- The current 5500 electronic filing system is not time-efficient for our clients or us.

We are preparing to offer E-Filing of the 2005 PBGC forms to our clients and have spent extensive time using the PBGC's online E-Filing system. Listed below are some thoughts and comments on filing the 5500 electronically, some of which are based on our experience with the PBGC's E-Filing system.

1. Completing 5500 filings via a Departmental Web site

A. Preparers: It would be beneficial to establish the Web site so that anyone authorized could login to the site and file the plan's 5500.

B. Attachments to the various Schedules (attachments to the Schedule B, Schedule C, and Schedule H):

1. Attachments Produced via the Web site: Could all attachments be generated on the Web site? For example, if the Notice to Terminated Accountant or Enrolled Actuary is required to be attached to the Schedule C, could this be produced online?

2. Scanning Attachments: Attachments can be scanned and saved as a .PDF file. Could these scanned files be posted to an online bulletin board for all parties who are involved with a filing to view? If so, the attachments could be posted to the bulletin board by the different individuals, and then electronically submitted with the filing.

C. Integrate with PBGC's Web site

1. It'd be helpful if the Web site was similar to the PBGC's site (format of Web site, how the forms are routed to practitioners involved, how

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accounts are established, ect...)

2. Link the Schedule B with the PBGC's Schedule A

3. Utilize the system for electronic signatures that the PBGC uses:

Security Question and Security Answer selected and used to signify an electronic signature

User ID and Password used to login to your account

4. Better yet, could one online account be used for filing the 5500 and the PBGC forms?

2. Responsibility for filings

If an electronic filing can be routed to multiple parties to prepare their assigned portion (including the plan administrator to sign and submit the filing), it seems that filing electronically would no longer impact who is responsible for the filings.

3. Filing Fees

We feel the determination of whether filing fees should be charged can be based on the costs incurred with filings.

1. If E-Filing reduces the cost to the EBSA: A processing fee could be charged for paper filings. This would also be an incentive for firms to file electronically.
2. If E-Filing does not reduce the cost to the EBSA: A processing fee could be charged for filings submitted electronically. The firm who maintains the account (not the plan administrator) could pay this processing fee since their other related expenses should decrease (ex. software expenses).

In any case, we feel processing fees should not be charged until the E-Filing system is up and running properly.

We look forward to offering electronic filing of the 5500 to our clients and thank you for considering our comments.

Sincerely,

Kimberly A. Hjort

Cheryl L. Gabriel, CPC

Pension Analyst

Consultant

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