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General Comment

A particular defined contribution multi-employer plan that I know, will have added expenses due to this rule. They will need to have a software program that will calculate these values for the plan's 5,000 participants. I feel that a defined-contribution plan should be just that, whatever you put into the plan, plus interest, less expenses is your total balance. The only payout option for this plan is a lump sum payment, so the lifetime income stream payments is not even an option, so adding that to a statement is just going to cause confusion to the participant. Also, having to calculate the projected account balance will be costly, as the amount of contributions is based on the hours the participant works each month. The Plan's staff will have to spend time gathering hour information for each participant in order to calculate some estimate of future benefit that is unlikely to be realized. Will the 3% safe harbor increase be based on the prior year's contributions, an average, or some other amount? It seems this would be a lot of expense and trouble for a confusing piece of information on their annual statement. Thank you.