



**Walter Welsh**  
*Executive Vice President, Taxes & Retirement Security*  
(202) 624-2157 t (866) 953-4149 f  
walterwelsh@acli.com

**James Szostek**  
*Vice President, Taxes & Retirement Security*  
(202) 624-2378 t (866) 953-4149 f  
jimszostek@acli.com

**Shannon Salinas**  
*Counsel, Taxes and Retirement Security*  
(202) 624-2028 t (866) 953-4149 f  
shannonsalinas@acli.com

Mailed Electronically

August 16, 2010

Office of Regulations and Interpretations  
Employee Benefits Security Administration  
Attn: Lifetime Income Joint Hearing, Room N-5655  
U.S. Department of Labor  
200 Constitution Avenue, NW  
Washington, DC 20210

**Subject: Request to Testify at Lifetime Income Joint Hearing**

Dear Sir or Madam:

The American Council of Life Insurers\* (“ACLI”) respectfully requests an opportunity to testify at the joint hearing of the Department of Labor and the Department of the Treasury on certain issues relating to lifetime income options for participants and beneficiaries in retirement plans.

ACLI member companies offer insurance contracts and other investment products and services to qualified retirement plans, including defined benefit pension and 401(k) arrangements, and to individuals through individual retirement arrangements (IRAs) or on a non-qualified basis. ACLI member companies also are employer sponsors of retirement plans for their own employees.

The life insurance industry provides protection for individuals and families against the risk of adverse financial consequences due to premature death, long-term care needs, disability, and outliving one’s financial assets or living at a substantially

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\* The ACLI represents more than 300 legal reserve life insurer and fraternal benefit society member companies operating in the United States. These member companies represent over 90% of the assets and premiums of the U.S. life insurance and annuity industry.

reduced standard of living. ACLI members have many years of experience providing lifetime income through the only financial product that may offer a guaranty for life, the annuity.

As we discussed in our response to the request for information, the principal obstacles to greater use of the annuity to provide guaranteed lifetime income is a lack of understanding on the part of plan sponsors and participants about the benefits and operation of the annuity and some uncertainties about the fiduciary duties of the sponsor in selecting and administering an annuity. We support efforts to make it easier for plan sponsors to provide information and education about annuities including the illustration of an individual account balance as lifetime income. Our testimony will focus on these two key areas: (1) on education, including information to help participants make choices regarding management and spend down of retirement benefits and the disclosure of account balances as monthly income streams, we plan to discuss survey data on point as well as key elements for the development of such disclosure (*approximately 5 minutes*); and (2) on fiduciary safe harbor for selection of lifetime income issuer or product, we plan to discuss fiduciary concerns and how these could be addressed by the Department of Labor (*approximately 5 minutes*).

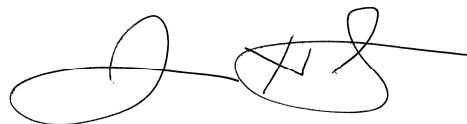
We plan to address our observations regarding the lifetime income marketplace, including product innovations, and steps the Department of Labor could take to further education regarding lifetime income to assist participants and beneficiaries in making informed decisions regarding their distribution choices.

ACLI would appreciate an opportunity to testify. We believe our testimony would be of value to you. We thank you for your consideration of this request.

Sincerely yours,



Walter C. Welsh  
Executive Vice President,  
Taxes & Retirement Security



James H. Szostek  
Vice President,  
Taxes & Retirement Security



Shannon Salinas  
Counsel,  
Taxes & Retirement Security