

September 8, 2022

Mr. Ali Khawar
Acting Assistant Secretary of Labor
Employee Benefits Security Administration
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210

**Re: Request to Testify
Procedures Governing the Filing and Processing of PTE Applications
RIN 1210-AC05**

Dear Acting Assistant Secretary Khawar:

We write on behalf of the Groom Law Group, Chartered, to request to testify at the upcoming hearing regarding the above-referenced rulemaking. The requested information about our proposed testimony is below.

1. Individuals Requesting to Testify

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2. Name of Organization

Groom Law Group, Chartered

3. Date of Written Comment

May 31, 2022

4. Concise Summary of Testimony

We intend to discuss our experience with the prohibited transaction exemption application process and our views as to how the proposed changes would unnecessarily increase the cost and complexity of applying for exemptive relief. We will express the view that the proposed changes are inconsistent with Congressional intent and that they will have a negative impact on the private retirement and health systems. Finally, we will provide constructive suggestions for alternative approaches that would be preferable from a legal and policy perspective.

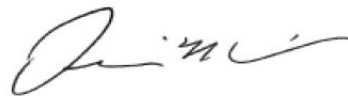
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We appreciate your consideration of this request to testify. Should you have any questions or need additional information, please do not hesitate to contact us.

Sincerely,



Jennifer E. Eller



David N. Levine



Michael P. Kreps



Allison Itami