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Office of Regulations and Interpretations,  
Employee Benefits Security Administration,  
U.S. Department of Labor  
Attn, Default Investment Regulations

I believe that the Proposed regulations for the Default Investment Alternatives Under Participant Directed Individual Account will provide employers with what would be needed to comply with its terms and the new section 404(c)(5) and provide the stated relief. I understand that this relief will not be contingent on a plan being an "ERISA 404(c) plan". I believe however, that the EBSA will miss an important opportunity by not adding language in the Proposed regulations to affirm that fiduciaries will lose the 404(c)(5) relief as participants direct their investments away from QDIA. I believe that the Proposed regulations should contain language on a mechanism of maintaining fiduciary relief for participant directed individual accounts out of QDIA's by affirming that ERISA section 404(c)(1) is the only way to continue this relief.

Sincerely,

Robert S. VandeVrede  
Definebenefits, Inc.