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September 14, 2006

Submitted electronically to e-ori@dol.gov

Office of Regulations and Interpretations
Employee Benefits Security Administration (EBSA)
Room N-5669
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210

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AND INTERPRETATIONS
2006 SEP 18 AM 10:52

ATTN: Revision of Form 5500 (RIN 1210-AB06)

Subject:

Changes to Schedule B -- Comments on Proposed Regulations

Mercer Human Resource Consulting is pleased to present comments on proposed regulations under RIN 1210-AB06. Mercer Human Resource Consulting has more than 4,300 US employees in offices across 40 cities, serving approximately 5,000 clients, large and small, in the public and private sectors.

The proposed regulations would require the enrolled actuary to show the percentage of total plan assets held as stock; debt (with break-outs for government, investment-grade, and high-yield debt); real estate; and other. The actuary also would be required to provide a measure of the duration of aggregate debt investments ("Macauley duration"). The proposed regulation asserts that the asset distribution information for single-employer plans should be readily available from the pension footnote in SEC 10-K filings and that the Macauley duration should be a simple computation for managers of bond portfolios.

For the following reasons, we believe that this additional information should not be placed on the Schedule B:

1. The asset allocation information found in the Form 10-K will often not be useable for plan reporting purposes.

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- The asset allocation information reported in the employer's financial statements is as of the plan sponsor's FASB measurement date, which may not coincide with the plan year-end or valuation date.
 - Asset allocation information in an employer's financial statement is often aggregated for all the employer's plans – foreign and domestic, qualified and nonqualified – it is not shown for individual plans and does not include the detailed debt breakout required
 - Not all affected plan sponsors are required to file 10-Ks or prepare financial statement footnotes in accordance with FAS 132.
2. The schedule B should show information calculated by the actuary, and the information upon which those calculations are predicated. Information extraneous to the work of the actuary should be certified by the plan administrator, and thus should be included on the Form 5500 or plan administrator certified attachments/schedules.
 3. The enrolled actuary signs the schedule B indicating that the information shown on the schedule and attachments is complete and accurate to the best of his or her knowledge. Enrolled actuaries are not trained to have the expertise to make any judgment about the accuracy of the additional information proposed by the regulations. As such, presenting such information in a publicly available document may be a violation of professional standards. If enrolled actuaries are required to prepare this information, the examinations for enrolled actuaries should test the skill sets necessary for the collection and review of this information. This has not been part of the material included on the examinations. While some actuaries are trained in investment issues, not all enrolled actuaries have the requisite training.
 4. Even if so trained, an enrolled actuary generally does not have access to the detailed information about each investment necessary to make a judgment about the additional information proposed by the regulations. The actuary cannot be assured of the bond manager's cooperation in providing the Macauley duration. Also, the trustee, custodian or bond manager have no duty to the enrolled actuary to provide such additional information. The Macauley duration should be calculated by the Trustee or the investment advisor and reported on the Trust statements.

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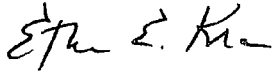
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We appreciate the opportunity to share our comments and concerns with you, and we would be glad to discuss any questions you may have.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Ethan E. Kra". The signature is written in a cursive style with a large initial "E".

Ethan E. Kra, FSA, EA

Worldwide Partner & Chief Actuary-Retirement

EEK:JST:mem