From: Philip Elmore [mailto:pelmore@aressco.com] Sent: Wednesday, December 27, 2006 11:14 AM

To: EBSA, E-ORI - EBSA **Subject:** Form 5500 revisions

I think it would make sense for you follks to look at the filing requirements for fully insured plans that include any of the following coverages: life, death, health, dental, disability. Generally speaking, very few of these plans having less than 300 lives would be experience rated and the insuring company will require a minimum of 60% to 75% participation for the plan to remain in force.

I think there would be quite a savings in expense for you and for the employer.

Philip Elmore