



**THE COUNCIL**  
of INSURANCE  
AGENTS & BROKERS

March 20, 2008

Via Email (e-ORI@dol.gov)

Mr. Fil Williams  
Office of Regulations & Interpretations  
Employee Benefits Security Administration  
U.S. Department of Labor  
200 Constitution Avenue, NW  
Room N-5655  
Washington, DC 20210

Re: 408(b)(2) Hearing (Hearing on Proposed Regulations, Reasonable Contract or Arrangement Under Section 408(b)(2) – Fee Disclosure, 72 Fed. Reg. 70987 (Dec. 13, 2007))

Dear Mr. Williams:

The Council of Insurance Agents & Brokers, and its standing committee, The Council of Employee Benefits Executives (collectively “The Council”), respectfully request an opportunity to testify at the hearing on the Department’s proposed regulations under Section 408(b)(2) of ERISA. In particular, the Council is requesting that I have the opportunity to testify on its behalf on the afternoon of April 1, 2008.

I am currently the Executive Vice President and General Counsel of Aon Corporation, the world’s largest insurance broker and one of the world’s largest employee benefits consulting firms. I served as Deputy Secretary of the U.S. Department of Labor from 2001-03 and thus am broadly familiar with the Department’s regulations and procedures.

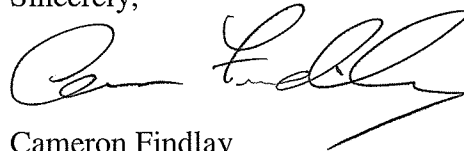
My testimony would expand upon and clarify the substance of The Council’s written comments on the proposed regulations, which were submitted to the Department on February 11, 2008. The testimony would focus on the role of the broker and the effect of the proposed rules on brokers and cover any questions that the Department may have. My testimony, including responding to the Department’s questions, should occupy no more than 30 minutes. An outline of my testimony follows:

I. Introduction to The Council and Its Mission (1 minute)

- II. Insurance Brokerage Industry in Context of Welfare Benefit Plans (6 minutes)
  - A. Description of Industry
  - B. Description of Contracting, Compensation and Other Industry Practices
  - C. Existing Disclosure Regime
- III. Proposed Regulations Are Unnecessary for/Inconsistent with Insurance Brokerage Industry (2 minutes)
- IV. PTE 84-24 Should Not Be Modified (1 minute)
- V. Questions and Answers (20 minutes)

I thank you in advance for the opportunity to testify at the hearing and look forward to your confirmation regarding the date and time of my testimony. If you have any questions or comments regarding my proposed testimony, please contact me at (312) 381-3017.

Sincerely,



Cameron Findlay