

**MEMO# 23242**

February 9, 2009

# ICI Requests Treasury Guidance on 2009 RMD Waiver

[23242]

February 9, 2009

TO: PENSION MEMBERS No. 10-09  
TRANSFER AGENT ADVISORY COMMITTEE No. 12-09  
BANK, TRUST AND RECORDKEEPER ADVISORY COMMITTEE No. 5-09    RE: ICI REQUESTS  
TREASURY GUIDANCE ON 2009 RMD WAIVER

The Institute prepared and submitted to the Treasury the attached list of issues related to the 2009 waiver of the required minimum distribution requirement, as enacted by the Worker, Retiree, and Employer Recovery Act of 2008. [\[1\]](#) In our cover letter, we emphasized that, while all issues on our list are important, it would be most important to get guidance on the rollover issues as soon as possible. We also recommended that Treasury establish a “good faith” compliance period for the 2009 RMD waiver for plan sponsors, RMD-eligible individuals and service providers.

Anna Driggs  
Assistant Counsel

[Attachment](#)

## endnotes

[\[1\]](#) See Memorandum to Pension Members No. 79-08, Federal Legislation Members No. 17-08 [23123], dated December 12, 2008; Memorandum to Pension Committee No. 35-08, Pension Operations Advisory Committee No. 35-08 [23146], dated December 23, 2008, and also Memorandum to Pension Members No. 80-08, Federal Legislation Members No. 18-08 [23134], dated December 18, 2008.

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