

MEMO# 11392

November 8, 1999

REVISED DRAFT COMMENT LETTER ON IRS REVENUE PROCEDURE 99-31

1 For the initial draft of the comment letter, see attachment to Institute Memorandum to Pension Committee No. 59- 99 and September 16th Conference Call Registrants, dated October 13, 1999. [11392] November 8, 1999 TO: PENSION COMMITTEE No. 64-99 SEPTEMBER 16th AND OCTOBER 27th CONFERENCE CALL PARTICIPANTS RE: REVISED DRAFT COMMENT LETTER ON IRS REVENUE PROCEDURE 99-31

Attached for your review and comment is a revised draft of the Institute's comment letter concerning Revenue Procedure 99-31. As you know, Revenue Procedure 99-31 provides examples of correction methods to address various operational failures for plans participating in the Employee Plans Compliance Resolution System (EPCRS). The attached draft has been revised to reflect member comments to an initial draft,¹ including comments received on an October 27th conference call. Please review the draft and contact me with any comments or suggestions by close of business, Tuesday, November 16, 1999. We plan to file the letter on Friday, November 19, 1999. I can be reached by phone (202/326-5837), by fax (202/326-5839), or by e-mail (tkim@ici.org). Thomas T. Kim Assistant Counsel

Attachment