

**MEMO# 7608**

February 2, 1996

## **DRAFT INSTITUTE COMMENT ON DOL PROPOSED PLAN ASSET REGULATION**

VIA FAX February 2, 1996 TO: PENSION COMMITTEE No. 5-96 RE: DRAFT INSTITUTE  
COMMENT ON DOL PROPOSED PLAN ASSET REGULATION

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Attached  
please find a draft of comments the Institute is preparing to submit to the Department of Labor regarding its proposed regulation altering the time frame in which plan assets must be deposited in trust. This draft will be discussed at the Pension Committee meeting scheduled for Tuesday, February 6, 1996, and in greater detail, at the meeting scheduled to discuss recent Department of Labor enforcement activity, which is scheduled for the morning of Wednesday, February 7, 1996. We are interested most particularly in comments and suggestions regarding (1) the alternative time frame for deposit, which is proposed in the draft, and (2) the concept of establishing an intermediate account for plan assets to enable data reconciliation to occur prior to the allocation of plan assets to individual participant accounts. Russell G. Galer Assistant Counsel - Pension Attachment

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