January 21, 2015

The Honorable Susan Collins  The Honorable Bill Nelson
United States Senate United States Senate
Washington, DC 20510 Washington, DC 20510

Dear Senator Collins and Senator Nelson:

On behalf of the American Benefits Council, I am writing to applaud the introduction of the Retirement Security Act of 2015. We stand ready to assist you in working toward enactment of this important piece of legislation.

The Council is a public policy organization representing principally Fortune 500 companies and other organizations that assist employers of all sizes in providing benefits to employees. Collectively, the Council’s members either sponsor directly or provide services to retirement and health plans that cover more than 100 million Americans.

The private retirement system is a great success and has helped ensure the retirement security of millions of Americans. But there is still more work to be done, especially with respect to the coverage of small business employees and with respect to benefit levels.

Your bill would take major steps forward in addressing both of these issues. We believe the bill’s reforms of the multiple employer plans rules will expand opportunities for small businesses to band together to maintain plans at a lower cost. In particular, we applaud the provision that would prevent an entire multiple employer plan from being disqualified by reason of a violation of the qualification rules by one or more participating employers. This inappropriate result under current law can deter many small employers from joining a multiple employer plan.

The Council is a strong supporter of automatic enrollment, and believes that the Retirement Security Act of 2015 would substantially increase the use of automatic enrollment through the establishment of an alternative safe harbor with key incentives
to adopt it. Moreover, the alternative safe harbor would set default contributions at higher levels that are better designed to achieve retirement security.

We thank you for your leadership in this important area and look forward to working toward enactment of this important bill.

Sincerely,

[Signature]

Lynn D. Dudley
Senior Vice President,
Global Retirement and Compensation Policy
American Benefits Council