

Comments on Internal Revenue Bulletin: 2013-4  
Announcement 2013-8  
Recommendations for Proposed e-signature Standards

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To Whom It May Concern:

The Pension Rights Center welcomes this opportunity to provide brief general comments on e-signature standards. The Pension Rights Center is a nonprofit consumer organization that has been working since 1976 to protect and promote the retirement security of American workers, retirees, and their families.

The Pension Rights Center has provided comments on several occasions about the harm to participants in pension and retirement savings plans that can occur when plan administrators rely on electronic communication.<sup>1</sup> More specifically, the Pension Rights Center, along with four other consumer organizations, addressed the issue of e-signatures in a 2005 letter to the Internal Revenue Service.<sup>2</sup>

It has been, and still is, our view that standards for communicating with retirement plan participants, including methods of election, merit special consideration due to the irreversible impact these communications and elections have on the retirement prospects of participants and their family members. Certain of these elections, such as a waiver of spouse rights, should only be made after careful consideration of all available options and in the presence of a third party, plan administrator or notary, who can confirm the identity of the person making the election.

We urge that standards of electronic communication and elections for retirement plan participants be given separate consideration, and that any e-signature standards developed as a result of this announcement not apply to the special case of retirement plans and their participants.

Sincerely,



Jane Smith  
Policy Associate

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<sup>1</sup> Comments in response to DOL Request for Information Regarding Electronic Disclosure by Employee Benefit Plans, RIN -1210-AB50:

[http://www.pensionrights.org/sites/default/files/docs/110606\\_prc\\_comments\\_to\\_rfi\\_electronic\\_disclosure.pdf](http://www.pensionrights.org/sites/default/files/docs/110606_prc_comments_to_rfi_electronic_disclosure.pdf)

<sup>2</sup> Comments on IRS proposed regulation, REG – 138362-04, “Proposed Regulations Concerning Use of Electronic Technologies for Providing Employee Benefit Notices and Transmitting Employee Benefit Elections and Consents.”

[http://www.pensionrights.org/policy/regulations/electronicconsent/electech\\_finalcomments10-12-05.pdf](http://www.pensionrights.org/policy/regulations/electronicconsent/electech_finalcomments10-12-05.pdf)