

March 20, 2013

G. Christopher Cosby
Employee Benefits Security Administration
U.S. Department of Labor
200 Constitution Ave., NW, Room N-5718
Washington, DC 20210

Re: Proposed Information Collection Request Submitted for Public Comment;
Survey Regarding Pension Benefit Statements

Dear Mr. Cosby:

We appreciate the opportunity to submit brief comments on the proposed survey regarding benefit statements for individual account plans. 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.

We are pleased that the Labor Department is working toward developing standards for the individual benefit statement. The individual benefit statement, along with the summary plan description, should provide the information participants and beneficiaries need to assess their progress in accumulating benefits for retirement. The proposed survey should be helpful in determining how to present this information to participants and beneficiaries.

However, we are concerned that the proposed survey appears to emphasize electronic communication by using an Internet panel and by encouraging respondents to submit responses electronically. We urge the Department to assure that the survey is designed to give appropriate weight to communication by paper by including a sufficient number of participants who do not have computers or Internet access. Many working Americans still do not have access to computers or the Internet. In fact, numbers confirm that the most vulnerable populations are the least likely to have computers or Internet access at home.¹

This survey is limited to benefit statements for individual account plans. We hope the Department will conduct a similar survey for benefit statements of defined benefit plans.

Sincerely,



Jane T. Smith
Policy Associate

¹U.S. Census Bureau, Current Population Survey, "Reported Internet Usage for Individuals 3 Years and Older, by Selected Characteristics: 2009," October 2009, Table 2.
(<http://www.census.gov/population/socdemo/computer/2009/tab02.xls>)