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To: Paperwork Comments
Subject: Comments: Proposed Submission of Information Collection for OMB Review
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Good afternoon-

I have read over the proposed changes and really have two questions.

1. One item is to "require plan administrators using APFT to report the effective interest rate." Will this just be the same EIR from funding results (using accrued benefits in the calculation) or do we need to calculate a separate EIR using vested accrued benefits? The different calculations could produce slightly different EIR.
2. Another item will "allow a plan administrator to list a second person whom PBGC could contact with questions about a filing." Would you anticipate this being another member of their company, actuarial service provider or other?

Thank you for your time.

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