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## PUBLIC SUBMISSION

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Summary of Benefits and Coverage and Uniform Glossary

**Comment On:** IRS-2011-0026-0002

Summary of Benefits and Coverage and Uniform Glossary: Templates, Instructions, and Related Materials under Public Health Service Act

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Comment on FR Doc # 2011-21192

### Submitter Information

**Name:** tom l presgrove

**Address:**

81 sommersby drive  
jackson, TN, 38305

**Email:** tpequip@usit.net

**Phone:** 731-660-4611

**Fax:** na

**Submitter's Representative:** na

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### General Comment

Dear sirs, the Summary of Benefits Coverage (SBC) is currently in the comment period. This document needs to alert holders of health or disability policy's, that any policy containing Descretionary Authority Clauses renders the policy holders helpless and without legal rights. The basis of this Authority is in all ERISA benefit plans. The plan administrator can deny any and all claims for any reason. ERISA preempts all state laws and federal courts will not even hear your complaint/case. The NAIC has tried to force states to BAN these clauses from Health/disability Insurance policy's. Many states have adopted the NAIC Model Act, the others states have stayed away and let Insurers continue raping employees and claimants. Please do this as a means of letting people know they are helpless and any effort to enforce your rights are futile.