



June 4, 2009

Submitted Via Email to 3-ORI@dol.gov

Office of Regulations and Interpretations  
Employee Benefits Security Administration  
Attn: Target Date Fund Joint Hearing  
Room N-5655  
U.S. Department of Labor  
200 Constitution Avenue, NW  
Washington, DC 20210

Elizabeth M Murphy  
Secretary  
Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549-1090

**Re: Written request to be heard at Target Date Fund Joint Hearing**

Dear Sir or Madam:

The American Benefits Council (Council) respectfully requests the opportunity to testify at the Department of Labor's (DOL) and Security and Exchange Commission's Target Date Fund Joint Hearing to be held at the DOL on June 18, 2009. 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 Council's witness will be an employer/plan sponsor who will testify on the following topics (and approximate times allotted to each):

1. Selecting and evaluating target date funds (TDFs), including employer's own experience – 3 minutes
2. Disclosure and understanding fund specifics – 2 minutes
3. Mandated glide paths or other automation – 1 minute
4. Clarification of fiduciary responsibilities – 2 minutes
5. Employer creation of own TDFs – 2 minutes

The Council would appreciate this opportunity to testify and believe we can provide very useful input regarding target retirement date funds from the employer perspective. If you have any questions, please feel free to call me at 202-289-6700.

Sincerely,

A handwritten signature in black ink, appearing to read "Jan Jacobson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jan M. Jacobson  
Senior Counsel, Retirement Policy  
American Benefits Council