



FBA NEWS NOTES

NEWS AND INFORMATION ON EMPLOYEE BENEFIT PLANS

SPRING 2000

Educating Participants May be in Your Best Interest

The regulations under ERISA §404(c) make it clear that employers are not required to provide advice. Those regulations state:

“No obligation to advise. A fiduciary has under part 4 of Title I of the Act to provide investment advice to a participant or beneficiary under an ERISA section 404(c) plan”

The DOL points out in Interpretive Bulletin 96-1, that investment education is not required to be provided in order to obtain 404(c) protection for losses resulting from participant investment decisions. Since compliance with the 404(c) regulations is, in effect, a defense to participant claims, it should be safe to assume that investment education is not generally required to comply with ERISA’s fiduciary rules for participant directed plans. In that regard, Interpretive Bulletin 96-1 states:

“The section 404(c) regulation conditions relief from fiduciary liability on, among other things, the participant or beneficiary being provided or having the opportunity to obtain sufficient investment information regarding the investment alternatives available under the plan in order to make informed investment decisions. Compliance with this condition, however, does not require that participants and beneficiaries be offered or provided either investment advice or investment education, e. g.,

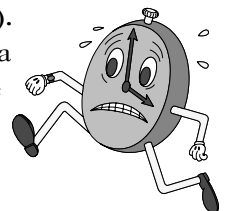
regarding general investment principles and strategies, to assist them in making investment decisions. 29 CFR 2550.404c-1(c)(4).”
(Emphasis added.)

But from a practical perspective, better-educated participants should make better investment decisions. From a legal perspective, the law is not clear on the fiduciary responsibilities of plan sponsors in permitting participants to direct investments.

Plan sponsors should seriously consider providing investment education to raise the level of investment knowledge of its employees to the appropriate point for selecting among the offered investment options.

1999 Form 5500

The IRS & DOL have announced that they have agreed to grant a two and one-half month extension of the filing deadline for filing 1999 Form 5500 (Annual Return/Report of Employee Benefit Plan) and related schedules (Form 5500 Series). The extension applies only to calendar year plans whose filing deadline is on or before July 31, 2000. For these plans, the deadline is automatically extended to October 16, 2000, without having to file a Form 5558 (Application for Extension of Time To File Certain Employee Plan Returns). The Agencies emphasized that filing a Form 5558 cannot further extend the automatic extension. The Agencies also warned that filers whose



normal due date is after July 31, 2000 will not receive an automatic extension. These filers must still file a Form 5558 in a timely manner in order to receive a two and one-half month extension.

The Gay Nineties

Some jaw-dropping market highlights from the past decade:

- 💰 The S&P 500 returned an annualized 18.2%, about 8% more than its historical average. A \$10,000 investment grew to \$53,266.
- 💰 Only 18% of stock funds beat the Vanguard 500 Index.
- 💰 In 1999, 172 funds more than doubled investors' money; 22 of them tripled it.
- 💰 Only five funds offered back-to-back triple-digit gains in both '98 and '99. Of those funds, two leverage the NASDAQ, one is Internet Fund, and the others are diversified stock funds (Berkshire Focus and Grand Prix)
- 💰 A \$10,000 investment in Dell Computers in 1990 would be worth nearly \$9 million today.

IRS Opens Plan Review Process

In the recently released Revenue Procedure 2000-20, the IRS sets forth a new prototype and volume submitter program for approving the amendments required under the 1994, 1996, 1997 and 1998 laws collectively referred to as the "GUST" amendments. This new Revenue Procedure replaces Revenue Procedures 89-9 and 89-13 governing both (1) master and prototype plans (M&P) and (2) regional prototype plans.

FBA has received a GATT/USERRA/SBJPA/USERRA/TRA'97 (GUST) qualification letters for our Volume Submitter Profit Sharing, Money Purchase and 401(k) Plans. *This includes cross-tested and age weighted plans.*

FBA intends to restate your plan during the next six months unless we hear from you to the contrary.

Employers that intend to adopt a certain prototype and volume submitter plans will be required to update their plans by the later of the general

remedial amendment period (i.e., the end of the 2001 plan year) or the last day of the 12th month beginning after the date the sponsor/practitioner gets approval for its prototype or volume submitter plan.

The IRS is opening its program to approve the GUST amendments, [Rev. Proc. 2000-20]. The IRS will rule on plan changes that were made in order to comply with new laws that passed from 1994 through 1998, commonly called the GUST amendments. These laws are the Uruguay Round Agreements Acts (GATT), the Uniformed Services Employment and Reemployment Rights Act of 1994 (USERRA), the Small Business Job Protection Act of 1996 (SBIPA), and the portions of the Taxpayer Relief Act of 1997 (TRA'97).

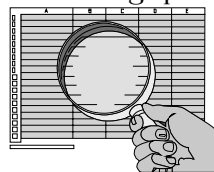
Companies may request advisory letters for volume submitter plans beginning March 8, 2000. The IRS will begin accepting applications for GUST letters for mass submitter plans and plans of national sponsors on April 7. The agency will begin accepting applications for GUST letters for nonmass submitter plans on May 8.

IRS Issues More Guidance Concerning 401(k) Safe Harbor Plans

The IRS has issued additional guidance concerning 401(k) plan safe harbors, in response to comments and suggestions regarding ways to make it easier for employers to adopt and administer 401(k) safe harbor plans. Designed-based safe harbors simplify the testing required to meet the notice, participation, and nondiscrimination requirements applicable to cash or deferred arrangements and matching contributions.

The notice provides information in a question and answer format with details concerning:

- Giving sponsors of existing 401(k) plans the flexibility to wait until as late as December 1 of a calendar year to choose to adopt the 401(k) safe harbor 3% employer nonelective contribution



method for that calendar year;

- Permitting 401(k) safe harbor plans to match elective or employee contributions on the basis of compensation for a payroll period, month or quarter;
- Providing an extension until May 1, 2000 for plan sponsors adopting the 401(k) safe harbor methods for the first time in 2000 to give the required safe harbor notice to employees;
- Providing that 401(k) safe harbor plans may require salary reduction elections to be made using whole percentages of pay or whole dollar amounts;
- Permitting plan sponsors to provide the 401(k) safe harbor notice electronically and other simplifications;
- Permitting 401(k) safe harbor plans to provide matching contributions on an employee's aggregate employee and elective contributions;
- Clarifying that 401(k) safe harbor plans may apply up to a 12-month suspension on employee after-tax contributions after an in-service withdrawal of those contributions;
- Permitting plan sponsors using the 401(k) safe harbor matching contribution method to exit the safe harbor prospectively during a plan year and, if employees are notified beforehand, switch to actual deferral percentage (ADP) and actual contribution percentage (ACP) nondiscrimination testing.

SPD Takes Precedence When Plan Documents Are Ambiguous

The U. S. Supreme Court has denied a petition for a writ of certiorari (Dkt. No. 99-1506) to review a decision of the U. S. Court of Appeals in St Louis (CA-8), which held that, where ambiguity exists between a disability plan's language and the summary plan description (SPD) relating to the amendment of benefits and the plan is only made available upon request, the SPD language is given precedence. (Barker v. Ceridian Corporation, CCH Pension Plan Guide ¶ 23,958P)

IRS Notice 2000-3 New Safe Harbor Provisions

The most useful provision of this new guidance, which supplements and expands Notice 98-52, is an employer's ability to elect to amend its 401(k) plan no later than 30 days before the end of the plan year to avoid testing of deferrals, and possibly the matching contributions, by making the fully-vested 3 percent of pay nonelective safe harbor contribution. Unfortunately, this option only applies to 401(k) plans that test on a current year basis (so this option includes plans that have adopted but stopped the safe harbor matching contributions).

In addition, an employer must:

- Notify participants prior to the beginning of the plan year that such an amendment may be made;
- Provide a supplemental notice to employees that the contribution will be made;
- Timely amend the plan and make the contribution.

The second notice, which must be provided no later than 30 days prior to the last day of the plan year, should state that a 3 percent contribution will be made for the current plan year. The plan can be amended within the period for making remedial amendments (the last day of the 2000 plan year). The employer's election to avoid ADP and possibly



"I'm not unrealistic like those dot-comers. I'd be happy with a seventy to eighty percent annual return."

ACP testing can be limited to the current plan year; and can be made on a year-by-year basis. Thus, any employer with a 401(k) plan can take advantage of this option by merely notifying participants prior to the start of the plan year that a later amendment may be made to the plan to provide for the safe harbor nonelective contribution. An employer may also avoid the need to prepare the multiple use test when the safe harbor contribution is made to the plan. However, this election to convert to a safe harbor plan requires that participant deferrals and matching contributions satisfy the requirements of Notice 98-52. That is, certain restrictions, discussed below apply to the right to make a salary deferral or receive a match. Should the deferral requirements be met but not the match requirements, only the ADP test will be avoided.

Notices 2000-3 and 98-52 condition any testing relief from both the ADP and ACP tests on the following plan requirements.

The plan must:

- Apply a reasonable and uniform definition of compensation on pay eligible for deferral;
- Permit salary deferrals for any even dollar amount or even percentage amount selected by the participant;
- Limit matching contributions to salary deferrals that do not exceed 4 percent of compensation;
- Ensure that the rate of match not increase as salary deferrals increase;
- Not permit the rate of match for any highly compensated employee (HC) to exceed the rate of match for any non-HC under the plan for each level of salary deferral.

If there is a failure to satisfy any of the last three conditions, only the ADF test will be deemed to have been satisfied. While the required notice of such a change must be provided within the same period as other safe harbor notices (at least 30 days prior to the beginning of the plan year). The guidance also contains a transitional rule for 2000, permitting an employer to take advantage of this option by making a notice prior to May 1, 2000.

Plans that elect for the first time to apply either the matching safe harbor or non-elective safe harbor feature for plan years beginning on or after January 1, 2000, and on or

before June 1, 2000, may provide the initial notice any time prior to May 1, 2000. The guidance continues to permit the 401(k) plan sponsor to implement the safe harbor options without a need to currently amend the plan. Such amendments are required within the time period for other remedial amendments. It would appear that an employer whose matching contributions and eligibility requirements complied with prior guidance would lose almost no ground by providing the notice. Sponsors who have adopted a safe harbor match may also provide the notice, giving the sponsor the option to cease making the safe harbor contribution under restrictions below and provide the 3 percent nonelective contribution to avoid the ADP and possibly the ACP tests.

Another useful component of this notice permits an employer that has elected to make a safe harbor matching contribution to suspend making those contributions and elect to satisfy the ADP and ACP tests on a current year basis. The reduction or elimination of the safe harbor match must be implemented on a prospective basis and cannot become effective less than 30 days after notifying participants of such change or if later; the date the plan is amended. To take advantage of this provision the employer will be required to amend the plan and make the matching safe harbor contribution through the effective date of amendment.

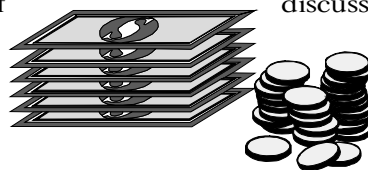
Once this notice and amendment is made, the sponsor can exercise one of two options:

- Satisfy the ACP and ADP testing for the entire plan year;
- If the notice provided above has been given, elect to make the safe harbor nonelective contribution for the full plan year.

This option will make it easy for an employer, with appropriate notice, to elect a short plan that ends no less than 30 days after the notice and amendment.

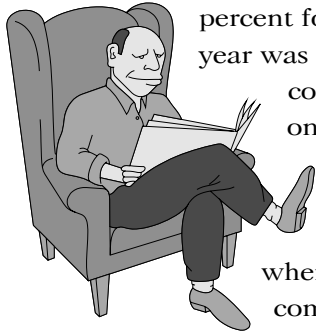
The last feature of the updated guidance to be discussed this month is the employer's ability in 2000 to put into effect two types of administrative procedures that should simplify the processing of deferrals and matching contributions.

The notice does away with a Notice 98-52 requirement of a "true-up" of matching



contributions when the participant's percentage of salary deferrals changes in the plan year. An employer can also now require that participants make elective contributions in either whole dollar amounts or even percentages of pay. Thus, for example, an employer may set a minimum salary deferral at 1 percent of pay.

"True-ups" occur when safe harbor matching contributions are made each pay period (or perhaps monthly or quarterly) up to a specified level of salary deferrals (say dollar-for-dollar up to 4 percent of pay). Prior to this guidance, an employee who deferred at 2 percent for the first six months and at 6



percent for the remainder of the year was to receive a matching contribution that was based on 4 percent for the full year; which could cause an extra matching amount to be made when the employee's compensation increased during the year.

Under this notice, the plan sponsor can revise the way matching contributions are made for this individual if matches are based on deferrals made each month. Thus the participant's match for the first 6 months would be based on 2 percent of pay and be limited to salary deferrals in the last 6 months of no more than 4 percent of pay adopting periodic matching also imposes a new mandatory period for making those safe harbor matching contributions. The matching contributions are required to be transferred to the plan no later than the calendar quarter following the period in which the salary deferrals receiving the match were collected by the sponsor.

Social Security Earnings Limits Repealed

The U.S. Senate voted unanimously to repeal the limits on money that a senior citizen aged 65 and older can earn without losing Social Security benefits. The House of Representatives had already approved this provision. President Clinton signed

the bill into law on April 7th. The repeal is effective retroactively to January 1, 2000.

The limit was originally imposed as an incentive for older workers to leave the workforce during the Great Depression of the 1930's to open jobs for younger workers. Changes in the job market and retirement income needs no longer support the original reason for the limit. For 2000, the benefit of an individual aged 65 to 69 would have been reduced by \$1 for each \$3 earned over \$17,000. Social Security recipients between age 62 and 65 will continue to see a benefit reduction of \$1 for each \$2 earned over \$10,080. An estimated 800,000 workers will be affected by the repeal of the limit.

Use Social Security Statements as Educational Tools

The Social Security Administration has started to send benefit estimates to every worker age 25 and older that is not already receiving Social Security benefits. These annual statements paint a partial picture of each worker's retirement income.

The Social Security statements estimate:

- The monthly amount workers will receive from Social Security if they retire early, late or at full retirement age;
- The monthly payment they would receive if they became severely disabled;
- The monthly payment a worker's family would receive if the worker died;
- Whether a worker has worked long enough to be covered by Medicare at age 65;
- The worker's earnings history.

It's always important to check the accuracy of Social Security statements. If an employee's name or Social Security number doesn't match the one on the statement, the employee should contact the Social Security Administration. Reminding employees to contact the SSA about any name change, such as due to marriage or divorce, could help avoid a later confusion when the employee is ready to draw benefits.

If the statement doesn't show a correct record of earnings, the employee should contact the SSA at 1-

800-772-1213. Urge the employee to notify you if a discrepancy involves your company.

New Comparability Plans Under IRS Scrutiny

The IRS has expressed concern that smaller employers are using “new comparability” and age-weighted profit-sharing plans to “inappropriately benefit” higher paid and key executives at the expense of their rank and file employees (IRS Notice 2000-14). New comparability and age-weighted plans are defined contribution plans that test for nondiscrimination on the basis of the future value of the benefits they provide instead of the contributions made to the plan.

The IRS is considering modifying the existing regulations to assure a more equitable result for the rank and file, and has asked for public comment. The Service seems to be concentrating on the effective availability of the plan formula levels in new comparability designs. Under such an approach, a plan formula that would be clearly unavailable to certain employees would be unable to satisfy nondiscrimination testing despite mathematically satisfying the nondiscrimination regulations. Depending on the actual design of the plan, this may constitute a clear threat to plans that base allocation rates on position.

According to unofficial sources, any modifications to the existing rules will apply no earlier than the

first day of the 2002 plan year. While some employers may be required to modify their plan formulas as the result of future IRS regulations, this may be a positive development because there was considerable pressure on the IRS to not allow cross-tested plans to continue to exist. Industry groups, especially the American Society of Pension Actuaries, have mounted an intensive campaign to encourage the IRS to preserve as much flexibility as possible for these plans.

Voluntary Fiduciary Correction Program Announced

A new DOL program that allows retirement plan fiduciary breaches (or potential breaches) was announced on March 15, 2000 (65 F.R. 14164). The new program will be known as the Voluntary Fiduciary Correction Program (VFCP). Similar to the IRS’s successful Employee Plans Compliance Resolution system (EPCRS), VFCP will allow plan fiduciaries to procure “no action” letters from the Pension and Welfare Benefits Administration (PWBA) related to the correction of a fiduciary breach. By issuing a no action letter, the PWBA will forego a civil investigation of the applicant’s role in any transaction detailed in the letter, or to assess an ERISA §502(1) civil penalty on the correction amount paid to the plan.

VFCP relief will not absolve criminal conduct. A fiduciary may apply for VFCP relief only if the plan and the applicant are not being investigated by the PWBA. Furthermore, the application cannot contain any evidence of any potential criminal wrongdoing. A potentially serious shortcoming of VFCP for fiduciaries is that the no action letter has no effect for fiduciary misconduct under ERISA. Only certain types of plan violations may be cured under VFCP.

They are:

- Delinquent participant contributions (including employee elective deferrals);
- Fair market value loans made to a party in interest, or below-market loans made to a non-party in interest;



*“One question. Now that death’s over and done with,
do I still have to worry about taxes?”*

- Below-market loans where a delay in perfection on a plan's security interest has occurred;
- The plan's purchase or sale of an asset from a party in interest;
- Sale and leaseback of a real property to an employer;
- Purchase or sale of property from a non-party in interest at an above fair market value price;
- Payment of benefits without proper valuation of the plan assets upon which payment is based;
- Duplicative, excessive or unnecessary compensation paid by the plan, or dual compensation to a plan fiduciary.

Additional guidance is provided for making fair market value determinations, determining correction amounts and calculation lost earnings. Appendix B of the procedure contains a checklist that must accompany all applications under the program. According to PWBA, VFCP has been structured to allow applicants to fully describe the transaction and to make full correction without the need to negotiate a solution with the DOL. This point is critical because PBWA believes that it is required to assess an ERISA §502(1) 20% civil penalty should further agency involvement become necessary.

Understanding the New Form 5500

The Employee Retirement Income Security Act (ERISA) and the Internal Revenue Code (IRC) require pension plans to file an annual report to the appropriate government agencies. These reports describe the participant data, the plan's financial condition, and its operations. Filing the Form 5500 in accordance with its instructions and the related regulations satisfies reporting requirements. Each year more than one million plans file the Form 5500/5500EZ, according to the Department of Labor (DCL).

In September 1997, the Internal Revenue Service (IRS) and the DCL proposed a revision of the Form 5500. After public comment and further study, the form was finalized.

In May, we will provide an insert that you can send out to clients to explain the changes and new procedures.

What Is EFAST?

Concurrent with the revisions to the Form 5500, the IRS and DCL developed a new computerized system, the ERISA Filing Acceptance System (EFAST), to streamline filing and processing of the new 5500 forms. The system uses computer-scannable forms and electronic filing technologies. In addition, the Pension and Welfare Benefits Administration (PWBA), an agency within the DCL, assumed the administrative responsibility for accepting the Form 5500/5500EZ filings beginning with the 1999 plan year. Previously, the forms had been filed with the IRS.

EFAST will begin processing the 1999 annual forms in July. The 1999 Form 5500 and Form 5500EZ are now available in two identical computer-scannable formats, machine-print and hand-print. The hand-print format is printed on special paper with green ink and must be completed by hand or typewriter. EFAST is designed to accept only approved hand- and machine-print forms. The system may not properly process forms that do not meet the government's specifications, such as those that are photocopies or "home grown" hand-printed forms. This could result in filings being rejected as deficient.

The hand-print forms can be filed only by mail. The IRS has begun its annual mailing of the 1999 Form 5500 and Form 5500EZ packages. Hand print forms are also available 24 hours a day, seven days a week, by calling I -800-TAX-FCRM (1-800-829-3676), or online at <http://www.irs.gov/farms.ubs/forms.htmI>.

Plan sponsors can choose to file their Form 5500/5500EZ on a machine-print format using computer software to enter data. The machine-print form, including all required attachments, may also be conveniently transmitted online via modem, or transferred to floppy disks, tapes, or CD-ROMs and sent via mail or approved private delivery service.

Machine filers may also choose to print a paper copy of the form from the computer and file via mail or approved private delivery



service. The data on each page is encrypted on a bar code that is decoded during processing and read into the system.

Plans interested in using the machine print version of the Form 5500/5500EZ will need to use EFAST-approved software, and electronic filers must obtain an electronic signature and file via approved EFAST transmitters (authorized transmitters of forms via modem). PWBA worked with private sector companies to develop filing software that's compatible with the new EFAST system. A list of approved software vendors is available through the PWBA Web site at <http://www.dol.gov/dol/pwba>.

Additional Assistance

To inform plan sponsors of these new requirements and to provide them with necessary information to file their 1999 forms correctly and efficiently, PWBA has launched a dedicated Web site, <http://www.efastdo.gov>. This site provides the latest information about filing requirements, electronic filing options, software availability, frequently asked questions and answers, information about upcoming seminars, and other important information.

To educate employee benefit practitioners on EFAST and the new filing and reporting requirements, PWBA and the International Foundation of Employee Benefit Plans (IFEBC) will be hosting 10 regional seminars beginning in May. The location and dates of these seminars are listed on the EFAST Web site. The PWBA will also be co-sponsoring five workshops with several certified public accountant state societies. Check the PWBA Web site for current information.

To assist filers with general questions about EFAST, a PWBA Help Desk is being established. In the meantime, you can call (202) 219-8770 for assistance. The IRS has also established a general information hotline, (800) 829-5500, to assist filers with questions pertaining to retirement plans (e.g., pension and profit-sharing plans including 401(k) plans), as well as Schedules B, E, F, H, I, P R, SSA, and T. This toll-free telephone service is available Monday through Friday from 8:00 a.m. to 9:30 p.m. EST.

IRS Announces Review of “Cross Tested” Plans

The IRS recently issued Notice 2000-14, which states that the IRS and the Treasury Department are “undertaking a review of issues” posed by cross-tested plans. According to the Notice, the review will focus on “the nondiscrimination requirements applicable to these plans,” which are sometimes referred to as “new comparability” plans. The Notice states that a cross-tested plan is a defined contribution plan that generally restricts “higher rates of employer contributions to highly compensated employees.” The Notice fails to say that this type of plan does so through use of the nondiscrimination testing method permitted by Treas. Reg. § 1.401 (a)(4)-8. These regulations acknowledge the time-value of a contribution by using an actuarial projection to convert the contribution to an equivalent benefit payable at normal retirement age. These equivalent benefits are usually expressed as a percentage of the participant's compensation and tested under the “general test” described in Treas. Reg. § 1.401 (a)(4)-2(c). The Notice explains that this process “effectively permits non-elective employer contributions under a defined contribution plan to be tested as the equivalent of employer-provided benefits under a defined benefit plan.”

The Notice acknowledges the “analytical underpinnings” of cross-testing. Nevertheless, the Service and Treasury are “concerned” whether cross-testing designs that provide for “built-in disparities in contribution rates between highly compensated and non-highly compensated employees can be reconciled with the basic purpose of the nondiscrimination rules as applied to defined contribution plans.”

The Notice describes a “typical” cross-tested plan as providing high allocation rates “(often 18% to 20% of compensation)” to highly compensated employees “(who tend to be older than a majority of non-highly compensated employees),” while non-highly compensated employees, “regardless of their age or years of service, receive comparatively low allocation rates (e.g., 3% of compensation).” In the

“typical” case, there is a “sufficient number of young non-highly compensated employees” to permit the employer to demonstrate compliance with the nondiscrimination standards by comparing “the actuarially projected value of the small allocations for those younger non-highly compensated employees with the actuarially projected value of the substantially larger allocations for older highly compensated employees.”

The Notice explains that the Service and Treasury are “concerned” that by design, “non-highly compensated employees never have an opportunity to earn the higher allocation rates as they work additional years for the employer and grow older.” It adds that non-highly compensated employees “may suffer significant reductions in their allocation rates” if their employer replaces an existing defined contribution plan with a cross-tested plan.

The Notice also suggests a “possible approach” would be to require that “the right to receive each rate of nonelective employer contributions must be currently and effectively available on a nondiscriminatory basis.” This approach would be “generally patterned” after the approach used in Treas. Reg. § 1.401 (a)(4)-4, which already contains this requirement for the “other three basic types of contributions,” elective contributions under IRC section 401(k), after-tax employee contributions, and employer matching contributions.

The Notice adds that “subject to certain conditions,” the determination of whether the contribution rates were available on a nondiscriminatory basis could “disregard differences in rates of nonelective contributions that result from differences in attained age or service.” As a result, the Service and Treasury “anticipate” that cross-testing would continue to be a “permissible testing alternative for generic age-weighted or service-based defined contribution plans,” which the Notice describes as plans “under which younger and shorter-service participants become entitled to higher allocation rates as they age and accumulate more service.” Cross-testing would also be available for other “appropriate plan designs,” but the Notice does not provide any further explanation of that phrase.

Finally, the Notice states that any modifications produced by this review would be applied to plans “on a prospective basis.” The Service and Treasury are not planning to apply any changes retroactively to existing plans.

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FULL SERVICE SUPPORT

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 - ▲ Plan calculations
 - ▲ Review with client and advisors
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 - ▲ Plan adoption
 - ▲ I.R.S. approval
- ▲ **Employee Communications**
 - ▲ Announcement letters
 - ▲ Employee meetings
- ▲ **Plan Administration**
 - ▲ Participant account record keeping
 - ▲ Summary valuation reports
 - ▲ Annual government reports

WHO TO CALL

For information concerning items in this newsletter, or information on our services, please call one of the following people. They will be pleased to assist you.

- ▲ **Your Plan Administrator**
- ▲ **Dick Watson - Ext. 1030**
- ▲ **J. R. Piper - Ext. 1037**
- ▲ **Steve Cranfield - Ext. 1024**
- ▲ **Ed Dorman - Ext. 1010**

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