

CC:IT&A:RU (REG-142499-01)
Courier's Desk
Internal Revenue Service
1111 Constitution Avenue, NW
Washington, D.C.

Re: Proposed Regulation under IRC section 414(v): Request to Testify

Dear Friends,

On behalf of the National Coordinating Committee for Multiemployer Plans (the NCCMP), I respectfully request the opportunity to testify at the April 30 public hearing on this proposed regulation.¹

As in the NCCMP's written comment, I plan to urge that the proposed regulation's treatment of the "universal-availability rule" for catch-up contributions be revised to accommodate the unique position of multiemployer plans. Specifically, multiemployer 401(k) plans and their contributing employers should each be allowed to offer a catch-up contribution option without regard to what the other is doing. Otherwise, the catch-up contribution opportunity could be denied to the participants in multiemployer 401(k) plans and, in many cases, to all of the other people working for an employer that contributes to a multiemployer 401(k) plan.

Thank you for your consideration.

Sincerely,

Judith F. Mazo

¹ The NCCMP is the only national organization devoted exclusively to protecting the interests of the approximately ten million workers, retirees, and their families who rely on multiemployer plans for retirement, health and other benefits. Our purpose is to assure an environment in which multiemployer plans can continue their vital role in providing benefits to working men and women. The NCCMP is a nonprofit organization, with member plans and plan sponsors in every major segment of the multiemployer plan universe.