



PAUL SCHOTT STEVENS
PRESIDENT

December 20, 2004

The Honorable Elaine L. Chao
Secretary of Labor
U.S. Department of Labor
Frances Perkins Building
200 Constitution Avenue, NW
Washington, DC 20210

Re: Enhancing Disclosure in Retirement Plans

Dear Secretary Chao:

The Investment Company Institute* commends the 2004 ERISA Advisory Council — convened by you and Assistant Secretary Ann Combs — for its recent report on improving disclosure in 401(k) and other retirement plans. The Institute has long been a strong proponent of improved disclosure designed to assist both plan sponsors and participants. The Advisory Council's recommendations represent a significant step toward this objective.

Better informing 401(k) participants about their investment options is, in our judgment, particularly vital. As we testified at the Advisory Council's meeting in September, participants would benefit from key information about *all* investment options offered under their plans.

We look forward to working with you, Assistant Secretary Combs, and Department staff as you consider the Advisory Council's recommendations.

Sincerely,

/s/ Paul Stevens

cc: The Honorable Ann L. Combs
Members of the 2004 ERISA Advisory Council

* The Investment Company Institute is the national association of the American investment company industry. Its membership includes 8,585 open-end investment companies ("mutual funds"), 636 closed-end investment companies, 141 exchange-traded funds and 5 sponsors of unit investment trusts. Its mutual fund members have assets of about \$7.565 trillion, accounting for approximately 95% of total industry assets. Individual owners represented by ICI member firms number 87.7 million as of mid 2004, representing 51.2 million households.