



TAX EXEMPT AND
GOVERNMENT ENTITIES
DIVISION

DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

201506018

NOV 13 2014

SE:T:EP:RA:A2

Re:

(the "Plan")

Dear

This letter is to inform you that your request to use substitute mortality tables for making computations under section 430 of the Internal Revenue Code (the "Code") for the Plan has been granted with respect to the populations specified in this letter, effective for a period of up to 10 years beginning with the plan year commencing January 1, 2015. Your request has been granted in accordance with section 430(h)(3) of the Code and section 303(h)(3) of the Employee Retirement Income Security Act of 1974 ("ERISA").

In granting this approval, we have considered only the development of the substitute mortality rates and whether they sufficiently reflect the mortality experience of the applicable plan populations. Accordingly, we are not expressing any opinion as to the accuracy or acceptability of any calculations or other material submitted with your request.

Permission is hereby granted to use the male and female substitute mortality rates shown in the tables below:

<u>Age</u>	Nondisabled		<u>Age</u>	Nondisabled	
	<u>Males</u>	<u>Females</u>		<u>Males</u>	<u>Females</u>
1	0.000520	0.000467	8	0.000176	0.000120
2	0.000351	0.000304	9	0.000171	0.000114
3	0.000292	0.000227	10	0.000173	0.000115
4	0.000227	0.000170	11	0.000179	0.000117
5	0.000208	0.000154	12	0.000186	0.000121
6	0.000199	0.000144	13	0.000196	0.000127
7	0.000191	0.000135	14	0.000210	0.000135

<u>Age</u>	<u>Nondisabled</u> <u>Males</u>	<u>Nondisabled</u> <u>Females</u>	<u>Age</u>	<u>Nondisabled</u> <u>Males</u>	<u>Nondisabled</u> <u>Females</u>
15	0.000222	0.000145	54	0.005018	0.006399
16	0.000234	0.000152	55	0.005474	0.006906
17	0.000248	0.000160	56	0.005958	0.007428
18	0.000261	0.000163	57	0.006476	0.007969
19	0.000273	0.000163	58	0.007032	0.008532
20	0.000285	0.000163	59	0.007632	0.009122
21	0.000297	0.000162	60	0.008285	0.009746
22	0.000309	0.000163	61	0.008999	0.010411
23	0.000321	0.000168	62	0.009787	0.011125
24	0.000333	0.000173	63	0.010663	0.011894
25	0.000346	0.000180	64	0.011642	0.012728
26	0.000359	0.000189	65	0.012743	0.013633
27	0.000374	0.000201	66	0.013988	0.014618
28	0.000391	0.000215	67	0.015398	0.015691
29	0.000412	0.000233	68	0.016998	0.016864
30	0.000436	0.000256	69	0.018815	0.018150
31	0.000465	0.000287	70	0.020878	0.019565
32	0.000501	0.000327	71	0.023216	0.021131
33	0.000543	0.000377	72	0.025864	0.022874
34	0.000593	0.000441	73	0.028852	0.024826
35	0.000653	0.000520	74	0.032216	0.027026
36	0.000724	0.000616	75	0.035986	0.029516
37	0.000806	0.000732	76	0.040196	0.032341
38	0.000901	0.000868	77	0.044872	0.035546
39	0.001011	0.001028	78	0.050041	0.039178
40	0.001135	0.001213	79	0.055729	0.043281
41	0.001276	0.001424	80	0.061958	0.047899
42	0.001435	0.001662	81	0.068748	0.053073
43	0.001612	0.001927	82	0.076117	0.058842
44	0.001809	0.002220	83	0.084082	0.065242
45	0.002027	0.002541	84	0.092658	0.072305
46	0.002266	0.002889	85	0.101855	0.080057
47	0.002527	0.003262	86	0.111682	0.088522
48	0.002811	0.003659	87	0.122146	0.097717
49	0.003119	0.004078	88	0.133250	0.107654
50	0.003450	0.004514	89	0.144997	0.118339
51	0.003806	0.004965	90	0.157387	0.129778
52	0.004186	0.005429	91	0.170420	0.141970
53	0.004589	0.005907	92	0.184094	0.154916

<u>Age</u>	<u>Nondisabled Males</u>	<u>Nondisabled Females</u>	<u>Age</u>	<u>Nondisabled Males</u>	<u>Nondisabled Females</u>
93	0.198409	0.168615	107	0.400000	0.322725
94	0.213363	0.183065	108	0.400000	0.337441
95	0.228956	0.198266	109	0.400000	0.351544
96	0.247094	0.211215	110	0.400000	0.364617
97	0.268391	0.220214	111	0.400000	0.376246
98	0.291103	0.226988	112	0.400000	0.386015
99	0.313746	0.232961	113	0.400000	0.393507
100	0.335097	0.239247	114	0.400000	0.398308
101	0.354193	0.246659	115	0.400000	0.400000
102	0.370331	0.255702	116	0.400000	0.400000
103	0.383070	0.266579	117	0.400000	0.400000
104	0.392229	0.279187	118	0.400000	0.400000
105	0.397886	0.293116	119	0.400000	0.400000
106	0.400000	0.307811	120	1.000000	1.000000

The above tables will be used for all male and female participants, respectively, in the Plan. The above rates were developed based on an experience study period from January 1, 2008, through December 31, 2012, and were calculated using the Whittaker-Henderson graduation method. The base year for the resulting tables is 2010. The Service has reviewed the substitute mortality rates and supporting information, and has determined that based on the information submitted, the rates sufficiently reflect the mortality experience of the applicable plan populations.

Your attention is called to section 430(h)(3)(C)(ii) of the Code, section 303(h)(3)(C)(ii) of ERISA, and section 1.430(h)(3)-2(d)(4) of the regulations, which describe the circumstances in which the use of the substitute mortality table will terminate before the end of the 10-year period described above. In general, the substitute mortality tables can no longer be used as of the earliest of:

- (1) The plan year in which the plan fails to satisfy the requirements of paragraph 1.430(h)(3)-2(c)(1) of the regulations, requiring that the groups for which substitute mortality tables are used must have credible mortality experience,
- (2) The plan year in which the plan fails to satisfy the requirements of paragraph 1.430(h)(3)-2(d)(1) of the regulations, regarding the requirement that other plans and populations in the controlled group must use substitute mortality tables unless it can be demonstrated that they do not have credible mortality experience,
- (3) The second plan year following the plan year in which there is a significant change in individuals covered by the plan as described in paragraph 1.430(h)(3)-2(d)(4)(ii) of the regulations (generally applicable when there is a change of 20% or more in the number of individuals in the population for which the substitute mortality table is used),

- (4) The plan year following the plan year in which a substitute mortality table used for a plan population is no longer accurately predictive of future mortality of that population, as determined by the Commissioner or as certified by the plan's actuary to the satisfaction of the Commissioner, and
- (5) The date specified in guidance published in the Internal Revenue Bulletin pursuant to a replacement of mortality tables specified under section 430(h)(3)(A) and 1.430(h)(3)-1, other than annual updates to the static mortality tables issued pursuant to 1.430(h)(3)-1(a)(3) of the regulations.

This ruling is directed only to the taxpayer that requested it. Section 6110(k)(3) of the Code provides that it may not be used or cited by others as precedent.

When filing Form 5500 for the plan years for which the substitute mortality tables are used, please note the information that is required to be attached to Schedule SB (Actuarial Information) in accordance with the instructions to that form.

We have sent a copy of this letter to your Authorized Representative pursuant to a power of attorney on file in this office and to the Manager, EP Classification in Baltimore, Maryland and to the Manager, EP Compliance Unit in Chicago, Illinois.

If you require further assistance in this matter, please contact
(ID#) at () - .

Sincerely,

David M. Ziegler, Manager
Employee Plans Actuarial Group 2

cc: