



TAX EXEMPT AND
GOVERNMENT ENTITIES
DIVISION

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

201506019

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:

Nondisabled			Nondisabled		
Age	<u>Males</u>	<u>Females</u>	Age	<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

Nondisabled			Nondisabled		
<u>Age</u>	<u>Males</u>	<u>Females</u>	<u>Age</u>	<u>Males</u>	<u>Females</u>
15	0.000222	0.000145	54	0.002475	0.002477
16	0.000234	0.000152	55	0.002793	0.002809
17	0.000248	0.000160	56	0.003142	0.003169
18	0.000261	0.000163	57	0.003518	0.003559
19	0.000273	0.000163	58	0.003914	0.003982
20	0.000285	0.000163	59	0.004329	0.004437
21	0.000298	0.000162	60	0.004764	0.004929
22	0.000308	0.000163	61	0.005224	0.005458
23	0.000321	0.000168	62	0.005712	0.006027
24	0.000330	0.000173	63	0.006236	0.006640
25	0.000340	0.000180	64	0.006804	0.007302
26	0.000356	0.000190	65	0.007427	0.008018
27	0.000363	0.000198	66	0.008120	0.008800
28	0.000374	0.000208	67	0.008899	0.009660
29	0.000392	0.000219	68	0.009786	0.010616
30	0.000422	0.000231	69	0.010806	0.011684
31	0.000475	0.000244	70	0.011992	0.012887
32	0.000535	0.000258	71	0.013378	0.014246
33	0.000600	0.000271	72	0.015007	0.015786
34	0.000668	0.000282	73	0.016925	0.017535
35	0.000735	0.000292	74	0.019182	0.019523
36	0.000800	0.000300	75	0.021832	0.021783
37	0.000860	0.000306	76	0.024931	0.024352
38	0.000910	0.000312	77	0.028537	0.027276
39	0.000950	0.000320	78	0.032707	0.030600
40	0.000983	0.000332	79	0.037500	0.034379
41	0.001009	0.000353	80	0.042971	0.038665
42	0.001030	0.000388	81	0.049174	0.043514
43	0.001052	0.000443	82	0.056160	0.048980
44	0.001077	0.000519	83	0.063974	0.055117
45	0.001110	0.000616	84	0.072654	0.061976
46	0.001155	0.000734	85	0.082233	0.069605
47	0.001219	0.000872	86	0.092736	0.078051
48	0.001304	0.001031	87	0.104183	0.087355
49	0.001416	0.001212	88	0.116588	0.097556
50	0.001558	0.001416	89	0.129962	0.108688
51	0.001734	0.001643	90	0.144313	0.120781
52	0.001944	0.001895	91	0.159648	0.133862
53	0.002191	0.002173	92	0.177311	0.147953

<u>Age</u>	<u>Nondisabled Males</u>	<u>Nondisabled Females</u>	<u>Age</u>	<u>Nondisabled Males</u>	<u>Nondisabled Females</u>
93	0.197891	0.163072	107	0.400000	0.373153
94	0.220338	0.179232	108	0.400000	0.377344
95	0.243709	0.196444	109	0.400000	0.381275
96	0.267170	0.214712	110	0.400000	0.385105
97	0.289993	0.234044	111	0.400000	0.388873
98	0.311560	0.254439	112	0.400000	0.392502
99	0.331357	0.275902	113	0.400000	0.395796
100	0.348981	0.298431	114	0.400000	0.398439
101	0.364135	0.318798	115	0.400000	0.400000
102	0.376629	0.334489	116	0.400000	0.400000
103	0.386383	0.346489	117	0.400000	0.400000
104	0.393422	0.355665	118	0.400000	0.400000
105	0.397881	0.362767	119	0.400000	0.400000
106	0.400000	0.368425	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: