



TAX EXEMPT AND  
GOVERNMENT ENTITIES  
DIVISION

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

201609010

December 1, 2015

Significant Index Number 0430.00-00

T:EP:RA:AZ

Re:

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, 2016. 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.

The substitute mortality tables will be used for all non-disabled male and non-disabled female participants, respectively, in the Plan. The substitute mortality rates were developed based on an experience study period from January 1, 2010, through December 31, 2013, and were calculated using the Whittaker-Henderson graduation method. The base year for the resulting tables is 2011. 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.

Permission is hereby granted to use the non-disabled male and non-disabled female substitute mortality rates shown in the table below:

Age	Males	Females	Age	Males	Females	Age	Males	Females
1	0.000510	0.000457	41	0.001127	0.000655	81	0.064000	0.052250
2	0.000344	0.000298	42	0.001202	0.000722	82	0.071439	0.058939
3	0.000286	0.000223	43	0.001287	0.000794	83	0.079622	0.066377
4	0.000223	0.000167	44	0.001383	0.000875	84	0.088583	0.074601
5	0.000204	0.000151	45	0.001496	0.000967	85	0.098356	0.083650
6	0.000195	0.000141	46	0.001628	0.001073	86	0.108970	0.093561
7	0.000187	0.000132	47	0.001785	0.001196	87	0.120454	0.104371
8	0.000173	0.000118	48	0.001970	0.001339	88	0.132834	0.116116
9	0.000167	0.000112	49	0.002188	0.001506	89	0.146132	0.128826
10	0.000170	0.000113	50	0.002444	0.001699	90	0.160367	0.142528
11	0.000175	0.000115	51	0.002743	0.001922	91	0.175552	0.157245
12	0.000183	0.000119	52	0.003088	0.002179	92	0.192696	0.172199
13	0.000192	0.000124	53	0.003484	0.002473	93	0.212174	0.186644
14	0.000206	0.000133	54	0.003932	0.002806	94	0.233117	0.200648
15	0.000218	0.000142	55	0.004431	0.003181	95	0.254743	0.214267
16	0.000230	0.000150	56	0.004981	0.003602	96	0.276355	0.227547
17	0.000244	0.000158	57	0.005580	0.004069	97	0.297341	0.240524
18	0.000256	0.000161	58	0.006229	0.004586	98	0.317178	0.253223
19	0.000268	0.000161	59	0.006926	0.005152	99	0.335428	0.265659
20	0.000279	0.000160	60	0.007672	0.005770	100	0.351737	0.277836
21	0.000292	0.000159	61	0.008466	0.006439	101	0.365842	0.289747
22	0.000303	0.000161	62	0.009310	0.007158	102	0.377560	0.301376
23	0.000316	0.000165	63	0.010209	0.007927	103	0.386800	0.312695
24	0.000326	0.000170	64	0.011168	0.008747	104	0.393553	0.323666
25	0.000337	0.000177	65	0.012201	0.009624	105	0.397898	0.334241
26	0.000354	0.000187	66	0.013325	0.010562	106	0.400000	0.344360
27	0.000362	0.000195	67	0.014563	0.011572	107	0.400000	0.353955
28	0.000372	0.000206	68	0.015947	0.012669	108	0.400000	0.362945
29	0.000390	0.000217	69	0.017510	0.013875	109	0.400000	0.371239
30	0.000420	0.000236	70	0.019289	0.015218	110	0.400000	0.378736
31	0.000472	0.000281	71	0.021320	0.016734	111	0.400000	0.385326
32	0.000532	0.000320	72	0.023641	0.018464	112	0.400000	0.390885
33	0.000597	0.000357	73	0.026287	0.020457	113	0.400000	0.395280
34	0.000663	0.000389	74	0.029296	0.022765	114	0.400000	0.398370
35	0.000731	0.000421	75	0.032706	0.025446	115	0.400000	0.400000
36	0.000797	0.000450	76	0.036557	0.028553	116	0.400000	0.400000
37	0.000862	0.000480	77	0.040893	0.032140	117	0.400000	0.400000
38	0.000927	0.000512	78	0.045760	0.036258	118	0.400000	0.400000
39	0.000991	0.000549	79	0.051203	0.040953	119	0.400000	0.400000
40	0.001057	0.000598	80	0.057269	0.046269	120	1.000000	1.000000

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 representatives pursuant to a power of attorney (Form 2848) 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 have any questions concerning this matter, please contact  
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(ID#

Sincerely,

David M. Ziegler, Manager  
Employee Plans Actuarial Group 2