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

TAX EXEMPT AND GOVERNMENT ENTITIES DIVISION

DEC 15 2016

T:EP:RA:A2

Re:
(Plan No.) ("Plan")
EIN: -

Taxpayer =

Dear :

This letter constitutes notice that approval has been granted for your request for an automatic extension for amortizing the unfunded liabilities as of April 1, 2015 for the above-named Plan, as modified below. This approval applies to such unfunded liabilities which are described in sections 431(b)(2)(B) and 431(b)(4) of the Internal Revenue Code ("Code"), and sections 304(b)(2)(B) and 304(b)(4) of the Employee Retirement Income Security Act of 1974 ("ERISA"). This extension is effective with the plan year beginning April 1, 2015, and applies to the eligible amortization charge bases as identified in your application submission that are established as of April 1, 2015. This approval will extend the amortization periods for these bases for the lesser of (1) 5 years, or (2) the period necessary to bring the extended amortization period to 17 years beginning April 1, 2015.[1]

Please note that your original application included amortization bases established with respect to shortfall losses determined under section 1.412(c)(1)-2(g) of the Income Tax Regulations ("Regulations") and experience losses that are amortized as outlined in section 1.412(c)(1)-2(h) of the Regulations. These amortization bases are not described in sections 431(b)(2)(B) and 431(b)(4) of the Code or sections 304(b)(2)(B) and 304(b)(4) of ERISA, and are therefore not eligible for an extension of the amortization period

[1] The amortization period is limited to ensure that the amortization period does not extend beyond the point at which the plan is projected to have sufficient assets to timely pay expected benefits and anticipated expenditures, as required under section 431(d)(1)(B)(iii) of the Code.

under section 431(d) of the Code. Your representative agreed to this change and provided an updated listing of amortization bases to which the extended amortization period would apply in an e-mail dated December 12, 2016.

The extension of the amortization periods of the unfunded liabilities of the Plan was granted in accordance with section 431(d)(1) of the Code. Section 431(d)(1)(A) of the Code requires the Secretary to extend the period of time required to amortize any unfunded liability of a plan for a period of time (not in excess of 5 years) if the Plan submits an application meeting the criteria stated in section 431(d)(1)(B). The plan has submitted the required information to meet the criteria in section 431(d)(1)(B), including a certification from the plan's actuary that:

(i) Absent the extension under subparagraph (A), the plan would have an accumulated funding deficiency in the current plan year or any of the 9 succeeding plan years,
(ii) The plan sponsor has adopted a plan to improve the plan's funding status,
(iii) The plan is projected to have sufficient assets to timely pay expected benefits and anticipated expenditures over the amortization period as extended, and
(iv) The notice required under paragraph (3)(A) has been provided, in accordance with Section 3.05 of Rev. Proc. 2010-52.

In granting this ruling, it is expected that the Plan's assumptions and methods will be reviewed and updated as appropriate so that each prescribed assumption is applied in accordance with applicable law and regulations. In addition, it is expected that each other assumption is reasonable (taking into account the experience of the plan and reasonable expectations) and such other assumptions, in combination, offer the best estimate of anticipated experience under the plan. Furthermore, we are not expressing any opinion as to the accuracy of any material submitted with your request.

Your attention is called to section 412(c)(7) of the Code and section 302(c)(7) of ERISA which describe the consequences that would result in the event the Plan is amended to increase benefits, change the rate in the accrual of benefits or to change the rate of vesting while the amortization extension remains in place.

We have sent a copy of this letter to your representative, the Manager, EP Classification in Baltimore, Maryland, and to the Manager, EP Compliance Unit in Chicago, Illinois.

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

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

Sincerely yours,

David M. Ziegler
Manager, EP Actuarial Group 2

cc:

Manager, EP Classification
Baltimore, Maryland

Manager, EP Compliance Unit
Chicago, Illinois