



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

201751024

TAX EXEMPT AND  
GOVERNMENT ENTITIES  
DIVISION

SEP 26 2017

SE:T:EP:RA:A2

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

Plan Sponsor =

Dear :

This letter constitutes notice that approval has been granted for your request for an automatic 5-year extension for amortizing the unfunded liabilities as of January 1, 20 , 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 January 1, 20 , and applies to the eligible amortization charge bases as identified in your representative's letter of August 9, 2017.

Please note that your original application included amortization bases established with respect to changes in funding methods and plan mergers, and combined amortization bases. 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, or may contain bases that are not described in these sections, and are therefore not eligible for an extension of the amortization period under section 431(d) of the Code. Your representative agreed to change the request to exclude these bases and, in a letter dated August 9, 2017, provided an updated listing of amortization bases to which the extended amortization period would apply. A copy of the updated list of amortization bases to be extended under this ruling, with a total outstanding balance of \$ as of January 1, 20 , is shown in the following table:

Type of Base	Date Established	Amortization Amount (Before Extension)	Period Remaining as of 1/1/20 (Before Extension)	Outstanding Balance as of 1/1/20
Initial Unfunded				
Plan Amendment				
Plan Amendment				
Plan Amendment				
Plan Amendment				
Plan Amendment				
Plan Amendment				
Plan Amendment				
Plan Amendment				
Plan Amendment				
Plan Amendment				
Benefit Level				
Plan Amendment				
Plan Amendment				
Plan Amendment				
Plan Amendment				
Plan Amendment				
Plan Amendment				
Plan Amendment				
Experience Loss				
Plan Amendment				
Change in Assumptions				
Change in Assumptions				
Experience Loss				
Plan Amendment				
Plan Amendment				
Experience Loss				
Plan Amendment				
Experience Loss				
Experience Loss				
Plan Amendment				
Experience Loss				
Experience Loss				
Plan Amendment				
Experience Loss				
Plan Amendment				
Change in Assumptions				
Plan Amendment				
CPFB Experience Loss				
Change in Assumptions				
Plan Amendment				
CPFB Experience Loss				
Plan Amendment				
Plan Amendment				
Change in Assumptions				
Change in Assumptions				
Experience Loss				
Experience Loss				
Total				

The extension of the amortization periods of the unfunded liabilities of the Plan has been 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:

- (i) 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,
- (ii) 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, and
- (iii) the Plan Sponsor obtained the appropriate approvals for any changes in assumptions or funding methods (whether through an individual private letter ruling or by qualifying for automatic approvals available in the Code, Treasury regulations or other generally applicable guidance.)

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. Please note that any amendment that increases liabilities for a profit sharing plan or any other retirement plans (whether qualified or unqualified) maintained by the Trustees of the Plan and covering participants of the Plan to which this ruling applies, would be considered an amendment for purposes of section 412(c)(7) of the Code and section 302(c)(7) of ERISA.

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

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  
Employee Plans Actuarial Group 2

cc: