



TAX EXEMPT AND  
GOVERNMENT ENTITIES  
DIVISION

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

AUG 22 2025

Release Number: 202552041

Release Date: 12/26/2025

Re: Request for use of plan-specific base substitute mortality tables

Taxpayer =

EIN: -

Plan 1 =

EIN: - (Plan No.: )

Plan 2 =

EIN: - (Plan No.: )

Plan 3 =

EIN: - (Plan No.: )

Dear :

This letter is to inform the Taxpayer that their request to use base substitute mortality tables for making computations under section 430 of the Internal Revenue Code ("Code") for Plan 1 has been granted with respect to the populations specified in this ruling. This ruling is effective for a period of up to 10 plan years beginning with the plan year commencing January 1, 2026 for Plan 1. Approval has been granted in accordance with section 430(h)(3)(C)(i) of the Code and section 303(h)(3)(C)(i) of the Employee Retirement Income Security Act of 1974, as amended ("ERISA").

This approval applies to the following specific populations of Plan 1:

- Male annuitants and nonannuitants, excluding disabled participants ("Non-Disabled Males")

- Female annuitants and nonannuitants, excluding disabled participants ("Non-Disabled Females")

Disabled participants of Plan 1 will continue to rely upon the standard mortality tables in accordance with section 1.430(h)(3)-2(c)(4) of the Regulations.

This ruling was originally requested by the Taxpayer in a letter postmarked on December 17, 2024. In addition, supplemental information was provided by the Taxpayer's authorized representatives on March 27, 2025.

Plan 1 previously received a ruling, dated July 13, 2023, granting the use of base substitute mortality tables under section 430(h)(3)(C)(i) of the Code, effective for a period of up to 10 plan years beginning with the plan year commencing January 1, 2024. However, in accordance with section 1.430(h)(3)-2(g) of the Treasury Regulations ("Regulations"), these previously approved base substitute mortality tables can no longer be used beginning January 1, 2026 because they were developed under the previous section 1.430(h)(3)-2 of the Regulations. The Taxpayer, therefore, prepared a new experience study and submitted this request to use base substitute mortality tables effective with the plan year beginning January 1, 2026 for a period of up to 10 years for the Non-Disabled Males and the Non-Disabled Females.

The Taxpayer represents that Plan 1, Plan 2, and Plan 3 are all the plans that are subject to section 430 of the Code within the Taxpayer's controlled group.

The Taxpayer submitted a separate request for approval to use base substitute mortality tables for Plan 2 at the same time as this request for Plan 1. The ruling for Plan 2 will be addressed in a separate letter.

The Taxpayer does not intend to use base substitute mortality tables for Plan 3 due to a lack of credible mortality experience and therefore, will use the standard mortality tables for calculations under section 430 of the Code.

The Taxpayer represents that Plan 1 is not a newly affiliated plan under section 1.430(h)(3)-2(f)(2) of the Regulations.

The Taxpayer represents that Plan 1 is not a multiple-employer plan, and the Taxpayer does not sponsor or participate in any multiple-employer plans.

The Taxpayer represents that no plans were spun off from any plan within the Taxpayer's controlled group within the last five years preceding the date of this request.

The Taxpayer represents that as of the submission date, no future risk transfer activity is anticipated for Plan 1.

The proposed base substitute mortality tables are constructed separately for the Non-Disabled Males and the Non-Disabled Females. Disabled participants of Plan 1 will continue to use the generally applicable tables and are excluded from the experience study data included in the Taxpayer's request.

The Taxpayer represents that the simplified rule under section 1.430(h)(3)-2(c)(2)(ii)(B) of the Regulations was not used.

This request is made in accordance with section 430(h)(3)(C)(i) of the Code, section 303(h)(3)(C)(i) of ERISA, section 1.430(h)(3)-2(b)(1) of the Regulations, and Revenue Procedure 2024-32.

Section 430(h)(3) of the Code states, in relevant part, that:

(A) In general. Except as provided in subparagraph (C) or (D), the Secretary shall by regulation prescribe mortality tables to be used in determining any present value or making any computation under this section. Such tables shall be based on the actual experience of pension plans and projected trends in such experience. In prescribing such tables, the Secretary shall take into account results of available independent studies of mortality of individuals covered by pension plans.

(C) Substitute mortality table –

(i) In general. Upon request by the plan sponsor and approval by the Secretary, a mortality table which meets the requirements of clause (iii) shall be used in determining any present value or making any computation under this section during the period of consecutive plan years (not to exceed 10) specified in the request.

(ii) Early termination of period. Notwithstanding clause (i), a mortality table described in clause (i) shall cease to be in effect as of the earliest of –

- (I) the date on which there is a significant change in the participants in the plan by reason of a plan spinoff or merger or otherwise, or
- (II) the date on which the plan actuary determines that such table does not meet the requirements of clause (iii).

(iii) Requirements. A mortality table meets the requirements of this clause if –

- (I) there is a sufficient number of plan participants, and the pension plans have been maintained for a sufficient period of time, to have credible information necessary for purposes of subclause (II), and
- (II) such table reflects the actual experience of the pension plans maintained by the sponsor and projected trends in general mortality experience.

Section 1.430(h)(3)-1 of the Regulations states, in relevant part, that:

- (d) Base mortality tables. The following are the base mortality tables. The base year for these tables is 2012<sup>1</sup>.

Section 1.430(h)(3)-2 of the Regulations states, in relevant part, that:

- (b) Procedures for obtaining approval to use substitute mortality tables –

- (1) Written request for approval to use substitute mortality tables –

- (i) General requirements. To use substitute mortality tables, a plan sponsor must first submit a written request to the Commissioner demonstrating that those substitute mortality tables meet the requirements of section 430(h)(3)(C) and this section. This request must specify the first plan year, and the term of years (not more than 10), for which the tables are to apply.
- (ii) Time for written request. Substitute mortality tables may not be used for a plan year unless the plan sponsor submits the written request described in paragraph (b)(1)(i) of this section at least 7 months before the first day of the first plan year for which the substitute mortality tables are to apply.

- (c) Development of substitute mortality tables –

- (2) Mortality experience requirements –

- (ii) Credible mortality information –

- (B) Simplified rule. Whether there is credible mortality information for a gender may be determined by only taking into account people who are at least age 50 and less than age 100. If there is credible mortality information for a gender using this simplified rule, the entire gender (not just those who are at least age 50 and less than age 100) has credible mortality information.

- (3) Determination of substitute mortality tables –

- (i) Requirement to use generational mortality table. A plan's substitute mortality tables must be generational mortality tables. A plan's substitute mortality tables are determined using the plan's base substitute mortality tables developed pursuant to paragraph (d) or (e) of this section and the mortality improvement factors described in paragraph (c)(3)(ii) of this section.
- (ii) Determination of mortality improvement factors. The mortality improvement factor for an age and gender is the cumulative mortality improvement factor determined under § 1.430(h)(3)-1(b)(2)(ii) for that age and gender for the applicable period. The applicable period is the period beginning with the base year for the base substitute mortality table determined under

<sup>1</sup> Due to the length, these base mortality tables have not been included in this ruling.

paragraph (d) or (e) of this section and ending in the calendar year in which the individual attains the age for which the probability of death is being determined. The base year for the base substitute mortality table is the calendar year that contains the day before the midpoint of the experience study period.

- (4) Disabled individuals. Under section 430(h)(3)(D), separate mortality tables are permitted to be used for certain disabled individuals. If the separate mortality tables issued under section 430(h)(3)(D) for certain disabled individuals are used, then those disabled individuals are disregarded for all purposes under this section. Thus, if the mortality tables under section 430(h)(3)(D) are used for disabled individuals under a plan, mortality experience with respect to those individuals must be excluded in developing mortality rates for substitute mortality tables under this section.

(6) Duration of use of tables –

- (ii) Early termination of use of tables. A plan's substitute mortality tables must not be used beginning with the earliest of –

(A) For a plan using a substitute mortality table for only one gender because of a lack of credible mortality information with respect to the other gender, the first plan year for which there is credible mortality information with respect to the gender that had lacked credible mortality information (unless an approved substitute mortality table is used for that gender);

(B) The first plan year for which the plan fails to satisfy the requirements of paragraph (c)(1) of this section (regarding use of substitute mortality tables for all plans in the controlled group), taking into account the rules of paragraph (f)(3) of this section (regarding the transition period for newly-affiliated plans);

(C) The second plan year following the plan year for which there is a significant change in individuals covered by the plan as described in paragraph (c)(6)(iii) of this section;

(D) The first plan year following the plan year for which a substitute mortality table used for a 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; or

(E) The date specified in guidance published in the Internal Revenue Bulletin in conjunction with a replacement of mortality tables specified under section 430(h)(3)(A) and § 1.430(h)(3)–1 (other than changes to the mortality improvement rates under § 1.430(h)(3)–1(b)(1)(iii) or annual

updates to the static mortality tables issued as noted in § 1.430(h)(3)–1(c)(1)(iv)).

(iii) Significant change in coverage –

(A) Change in coverage from time of experience study. For purposes of applying the rules of paragraph (c)(6)(ii)(C) of this section, a significant change in the individuals covered by a substitute mortality table for a plan year occurs if the number of individuals covered by the substitute mortality table for the plan year is less than 80 percent or more than 120 percent of the average number of individuals in that population over the years covered by the experience study on which the substitute mortality tables are based. However, a change in coverage is not treated as significant if the plan's actuary certifies in writing to the satisfaction of the Commissioner that the substitute mortality tables used for the population continue to be accurately predictive of future mortality of that population (taking into account the effect of the change in the population).

(B) Change in coverage from time of certification. For purposes of applying the rules of paragraph (c)(6)(ii)(C) of this section, a significant change in the individuals covered by a substitute mortality table for a plan year occurs if the number of individuals covered by the substitute mortality table for the plan year is less than 80 percent or more than 120 percent of the number of individuals covered by the substitute mortality table in a plan year for which a certification described in paragraph (c)(6)(iii)(A) of this section was made on account of a prior change in coverage. However, a change in coverage is not treated as significant if the plan's actuary certifies in writing to the satisfaction of the Commissioner that the substitute mortality tables used by the plan with respect to the covered population continue to be accurately predictive of future mortality of that population (taking into account the effect of the change in the population).

(d) Full credibility –

(2) Experience study period requirements –

(i) General rule. The base substitute mortality table for a gender or other population must be developed from an experience study of the mortality experience of that population that is collected over an experience study period. The experience study period must consist of 2, 3, 4, or 5 consecutive 12-month periods, and must be the

same period for all populations except as provided in paragraph (c)(5)(iii) of this section.

(ii) Requirement to use recent experience data –

(A) General rule. Except as provided in paragraph (d)(2)(ii)(B) of this section, the last day of the experience study period must be less than 3 years before the first day of the first plan year for which the substitute mortality tables are to apply. For example, if January 1, 2019, is the first day of the first plan year for which the substitute mortality tables will be used, then an experience study using calendar year data generally must include data collected for a period that ends no earlier than December 31, 2016.

(3) Full credibility threshold –

(i) Threshold number of deaths. The full credibility threshold for a gender or other population is the product of 1,082 and the population's benefit dispersion factor. In calculating the population's benefit dispersion factor, for purposes of paragraphs (d)(3)(iii), (iv), and (v) of this section, the population is adjusted, as appropriate, for individuals who leave the population on account of a reason other than death.

(ii) Population's benefit dispersion factor. The population's benefit dispersion factor is equal to—

(A) The number of expected deaths for the population during the experience study period (as defined in paragraph (d)(3)(iii) of this section); multiplied by

(B) The sum of the mortality-weighted squares of the benefits (as defined in paragraph (d)(3)(iv) of this section); divided by

(C) The square of the sum of the mortality-weighted benefits (as defined in paragraph (d)(3)(v) of this section).

(4) Development of mortality rates –

(i) In general. The mortality rates under the base substitute mortality tables must be amounts-weighted mortality rates that are derived from the experience study. Except as provided in paragraph (d)(4)(iv) of this section, the mortality rate for an age and gender is determined by multiplying the mortality rate for that age and gender from the standard mortality table determined under paragraph (d)(4)(iii) of this section by the mortality ratio determined under paragraph (d)(4)(ii) of this section. If the simplified rule of paragraph (c)(2)(ii)(B) of this section is used for the population, then the mortality ratio is determined only taking into account people who are at least 50 years old and less than 100 years old, but the mortality ratio is applied to all ages.

## (ii) Mortality ratio –

(A) In general. Except as provided in paragraph (d)(6) of this section, a mortality ratio is determined for a gender or other population within a gender, and is equal to the quotient determined by dividing—

(1) The sum, for all years in the experience study period, of the benefit amount for all individuals in the population at the beginning of the year who died during the year, by

(2) The sum, for all years in the experience study period, for all individuals in the population at the beginning of the year (adjusted, as appropriate, for individuals who leave on account of reason other than death), of the product of –

(i) The probability of death of the individual using the mortality rate for the individual's age and gender from the standard mortality table determined under paragraph (d)(4)(iii) of this section; and

(ii) The benefit amount for the individual.

## (iii) Standard mortality table –

(A) Projection of base table. Except as otherwise provided in this paragraph (d)(4)(iii), the standard mortality table for a year is the mortality table determined by applying cumulative mortality improvement factors determined under § 1.430(h)(3)-1(b)(2)(ii) to the base mortality table under § 1.430(h)(3)-1(d) for the period beginning with the base year for that mortality table and ending in the base year for the base substitute mortality table determined under paragraph (c)(3)(ii) of this section. For purposes of the preceding sentence, the cumulative mortality improvement factors are determined using the mortality improvement rates described in § 1.430(h)(3)-1(b)(1)(iii) that apply for the calendar year during which the plan sponsor submits the request for approval to use substitute mortality tables.

(B) Adjustments to standard mortality table for 2020, 2021, and 2022. If a 12-month period in the experience study period begins after December 31, 2019, and before January 1, 2023, the probability of death for an individual under paragraph (d)(4)(ii)(A)(2)(i) of this section is determined as the mortality rate for the individual's age (at the beginning of the year) and gender from the standard mortality table determined under paragraph (d)(4)(iii)(A) of

this section multiplied by the adjustment factor in Table 1 for the calendar year that includes the first day of the 12-month period. For example, for an experience study period that begins April 1, 2019, and ends March 31, 2023, the probability of death for the year beginning April 1, 2022, for a male annuitant who is age 65 as of that date is the probability of death from the base mortality table (0.01087), multiplied by the cumulative mortality improvement factor for the period from 2012 to 2021 (1.02292) and by the adjustment factor for the 2022 calendar year of 1.075, resulting in a probability of death of 0.01195.

Table 1 to Paragraph (d)(4)(iii)(B)

Calendar Year	Adjustment Factor
2020	1.15
2021	1.15
2022	1.075

- (iv) Modification for ages 96 and older. Mortality rates for ages 96 and older under the base substitute mortality table are determined using the rules of paragraph (d)(4)(i) of this section but substituting a modified mortality ratio for the mortality ratio determined under paragraph (d)(4)(ii) of this section. The modified mortality ratio is determined as follows—

(A) For ages 96 through 109, if the mortality ratio is greater than 1.0, the modified mortality ratio is equal to the mortality ratio for the population reduced by 1/15th of the excess of the mortality ratio over 1.0 for each year that the age exceeds 95.

(B) For ages 96 through 109, if the mortality ratio is less than 1.0, the modified mortality ratio is equal to the mortality ratio for the population increased by 1/15th of the excess of 1.0 over the mortality ratio for each year that the age exceeds 95.

(C) For ages 110 and older, the modified mortality ratio is equal to 1.0.

- (v) Change in number of individuals covered by table. Experience data may not be used to develop a base table if the number of individuals in the population covered by the table (for example, the male annuitant population) as of the last day of the plan year before the year the request for approval to use the substitute mortality table is made is less than 80 percent or more than 120 percent of the average number of individuals in that population over the years covered by the experience study on which the substitute mortality

tables are based, unless it is demonstrated to the satisfaction of the Commissioner that the experience data is accurately predictive of future mortality of that population (taking into account the effect of the change in individuals) after appropriate adjustments to the data are made (for example, excluding data from individuals with respect to a spun-off portion of the plan). For this purpose, a reasonable estimate of the number of individuals in the population covered by the table may be used.

(e) Partial credibility –

(1) In general. The mortality experience with respect to a population has partial credibility if the actual number of deaths for that population during the experience study period described in paragraph (d)(2) of this section is at least equal to 100 and is less than the full credibility threshold described for the population in paragraph (d)(3) of this section. If the mortality experience for the population has partial credibility, then in lieu of creating a base substitute mortality table as described in paragraph (d) of this section, the base substitute mortality table is created as the sum of—

(i) The product of—

- (A) The partial credibility weighting factor determined under paragraph (e)(2) of this section; and
- (B) The mortality rates that are derived from the experience study determined under paragraph (d)(4)(i) of this section; and

(ii) The product of—

- (A) One minus the partial credibility weighting factor described in paragraph (e)(2) of this section; and
- (B) The mortality rate from the standard mortality tables described in paragraph (d)(4)(iii) of this section.

(2) Partial credibility weighting factor. The partial credibility weighting factor is equal to the square root of the fraction—

- (i) The numerator of which is the actual number of deaths for the population during the experience study period, and
- (ii) The denominator of which is the full credibility threshold for the population described in paragraph (d)(3) of this section.

(f) Special rules for newly-affiliated plans –

(2) Definition of newly-affiliated plan. For purposes of this paragraph (f), a plan is a newly-affiliated plan if the plan sponsor becomes a member of the new controlled group in connection with a merger, acquisition, or similar transaction described in § 1.410(b)-2(f). A plan also is treated as a newly-affiliated plan in connection with a merger, acquisition, or similar transaction described in § 1.410(b)-2(f).

(g) Applicability date –

- (1) General rule. This section applies for plan years beginning on or after January 1, 2025. Except as provided in paragraph (g)(2) or (3) of this section, the substitute mortality table used for a plan for such a plan year must comply with the rules of paragraphs (a) through (f) of this section.
- (2) Transition rule for previously approved substitute mortality tables. If a plan sponsor has received approval from the Commissioner to use substitute mortality tables for a plan year beginning in 2025, then the plan's base substitute mortality tables that were approved are treated as satisfying the requirements of paragraph (d) or (e) of this section, as applicable, for that plan year.

Section 303(h)(3) of ERISA states, in relevant part, that:

(C) Substitute mortality table.—

- (i) In general.—Upon request by the plan sponsor and approval by the Secretary of the Treasury, a mortality table which meets the requirements of clause (iii) shall be used in determining any present value or making any computation under this section during the period of consecutive plan years (not to exceed 10) specified in the request.
- (iii) Requirements.—A mortality table meets the requirements of this clause if—
  - (I) there is a sufficient number of participants, and the pension plans have been maintained for a sufficient period of time, to have credible information necessary for purposes of subclause (II), and
  - (II) such table reflects the actual experience of the pension plans maintained by the sponsor and projected trends in general mortality experience.

Revenue Procedure 2024-32 sets forth the procedure by which the sponsor of a defined benefit plan that is subject to the funding requirements of § 430 of the Code may request approval from the Internal Revenue Service ("IRS") for the use of plan-specific substitute mortality tables in accordance with § 430(h)(3)(C) and § 1.430(h)(3)-2 of the Regulations.

Section 8.1. of Revenue Procedure 2024-32 states, in relevant part, that the following information must be provided in tabular form for each population within the plan (or aggregated group) for which approval to use substitute mortality tables is requested, aggregating all plans that have the same plan year:

- (1) The average number of individuals within the population during the experience study period; and
- (2) The number of individuals within the population as of the last day of the plan year immediately preceding the plan year during which approval to use substitute mortality tables is requested.

The Taxpayer's proposed base substitute mortality tables are developed based on an experience study period from January 1, 2019 through December 31, 2023, with a base year of 2021. This satisfies the requirements under section 1.430(h)(3)-2(d)(2) of the Regulations.

The Taxpayer's proposed base substitute mortality tables are developed by adjusting the applicable standard mortality tables in section 1.430(h)(3)-1(d) of the Regulations by the mortality ratios, in accordance with section 1.430(h)(3)-2(d)(4)(i) of the Regulations, and by the credibility weighting factors, in accordance with section 1.430(h)(3)-2(e)(1) of the Regulations, shown below:

**Mortality Ratio and Credibility Weighting Factor Table**

<b>Population</b>	<b>Mortality Ratio</b>	<b>Credibility Weighting Factor</b>
Non-Disabled Males		
Non-Disabled Females		

The mortality ratios above are determined in accordance with section 1.430(h)(3)-2(d)(4)(ii) of the Regulations and the credibility weighting factors shown above are determined in accordance with section 1.430(h)(3)-2(e)(2) of the Regulations.

Permission is hereby granted to use the base substitute mortality tables, shown below, for the Non-Disabled Males and the Non-Disabled Females.

**Base Substitute Mortality Tables**  
**Approved for Use Beginning with the Plan**  
**Year Commencing January 1, 2026 for Plan 1**

**Base Year 2021**

<b>Age</b>	<b>Non-Disabled Males</b>	<b>Non-Disabled Females</b>
1		
2		
3		
4		
5		
6		
7		
8		
9		

Age	Non-Disabled Males	Non-Disabled Females
10		
11		
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Age	Non-Disabled Males	Non-Disabled Females
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<b>Age</b>	<b>Non-Disabled Males</b>	<b>Non-Disabled Females</b>
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In granting this approval, we have only considered whether these base substitute mortality tables are developed in accordance with section 1.430(h)(3)-2 of the Regulations and Revenue Procedure 2024-32. Accordingly, we are not expressing any opinion as to the accuracy or acceptability of any calculations or other material submitted with the Taxpayer's request.

These approved base substitute mortality tables must be applied on a generational basis, as provided in section 1.430(h)(3)-2(c)(3)(i) of the Regulations.

The Taxpayer's attention is called to section 430(h)(3)(C)(ii) of the Code and section 1.430(h)(3)-2(c)(6)(ii) of the Regulations, which describe the circumstances in which the use of these approved base substitute mortality tables will terminate before the end of the 10-year period described above.

We also call the Taxpayer's attention to the fact that Plan 3 experienced 91 male deaths during the experience study period (January 1, 2019 – December 31, 2023). This population will have credible mortality experience if it experiences at least 100 deaths

during a 5-year period (corresponding to the length of the experience study period used to construct the substitute mortality tables for the Non-Disabled Males and the Non-Disabled Females). It is important to monitor this population to ensure that appropriate action is taken should this occur, to avoid violating section 1.430(h)(3)-2(c)(6)(ii)(B) of the Regulations.

The Taxpayer's attention is also called to the fact that a certification must be provided each plan year that it is required under section 1.430(h)(3)-2(c)(6)(iii) of the Regulations, signed by the enrolled actuary for Plan 1, stating that the approved base substitute mortality tables continue to be accurately predictive of the expected future mortality for the Non-Disabled Males and the Non-Disabled Females. The certification must also contain a statement that:

- (1) The enrolled actuary is current with educational requirements set forth by the Joint Board for the Enrollment of Actuaries as well as any other actuarial designations asserted;
- (2) The enrolled actuary was personally involved in the determination that these approved base substitute mortality tables are still accurately predictive and provides the actuary's best estimate for the Non-Disabled Males and the Non-Disabled Females;
- (3) In determining that these approved base substitute mortality tables are still accurately predictive, the enrolled actuary took into consideration the effect of business combinations, plan mergers or spinoffs and settlements/other risk transfers, and other events that would have similar effects on the relevant populations; and
- (4) The enrolled actuary has the specific knowledge and experience to make the judgements set forth above and attests to these representations.

All required certifications must be provided on or before the date Form 5500 is filed for each plan year for which the certification is required and must be accompanied by the supporting information relied upon by the enrolled actuary to make that certification. To the extent possible, please also provide the following supporting information:

- (1) The number of actual deaths during the experience study period used to develop these approved base substitute mortality tables and the beginning and ending dates of the experience study period;
- (2) A table showing the number of expected deaths and actual deaths, reported separately as of December 31, 2023 and for each subsequent plan year through the plan year immediately preceding the most recent actuarial valuation, and in total;
- (3) A table similar to the stability demonstration required under section 8.1. of Revenue Procedure 2024-32, showing the average number of participants in the population covered by these approved base substitute mortality tables during the experience study period and the number of participants in that population as of the end of each plan year, beginning with December 31, 2023 through the plan

**If you disagree with the proposed deletions**

Please return the copy and show, in brackets, any additional information you believe should be deleted. Include a statement supporting your position. Only material falling within the seven categories listed above may be deleted. Your statement should specify which of these seven categories is applicable with respect to each additional deletion you propose. Mail or fax your deleted copy and statement to:

**Internal Revenue Service**

Attention: Chief, CC:PA:LPD:DS

Ben Franklin Station

Post Office Box 7604

Washington, DC 20044

Fax: 855-592-8978

It must be faxed or postmarked no later than the "Last date to request IRS review" shown on this notice. We will give your submission careful consideration. If we determine we cannot make any or all of the additional deletions you suggest, we will so advise you not later than 20 days after we receive your submission. You will then have the right to file a petition in the United States Tax Court if you disagree with us. Your petition must be filed no later than the "Last date to petition Tax Court" shown on this notice, which is 60 days after the mailing date of this notice. If a petition is filed in the Tax Court, the disputed portion(s) of the ruling will not be placed in the Reading Room until after a court decision becomes final.

If no petition is filed in the Tax Court, the deleted copy of your ruling will be made open to public inspection on the date shown on this notice. If the transaction to which the ruling relates will not be completed by then, you may request a delay of public inspection.

**Request for delay of public inspection**

You may request a delay of public inspection of up to 90 days, or 15 days after the transaction is completed, whichever is later. The request for delay must be received by the IRS no later than the "Last date to request delay" shown on this notice, which is 60 days after the mailing date of this notice. Mail or fax your request for delay to:

**Internal Revenue Service**

Attention: Chief, CC:PA:LPD:DS

Ben Franklin Station

Post Office Box 7604

Washington, DC 20044

Fax: 855-592-8978

You may request a second delay of up to an additional 180 days (or 15 days after the completion of the transaction, whichever is earlier) if the transaction is not completed by the end of the original delay period and if good cause exists for additional delay. We must receive a request for a second delay at the above address at least 30 days before the original delay period ends.

**Requests for additional disclosure**

After the copy of your ruling, with deletions, is placed in our online FOIA Reading Room, any person may request us to make additional portions of the ruling open to public inspection. If we receive a request that involves disclosure of names, addresses, or taxpayer identifying numbers, we will deny the request and you will not be contacted. If that request involves disclosure of anything other than names, addresses, or taxpayer identifying numbers, we will contact you before taking action.

When filing the Form 5500 for Plan 1 for plan years which these base 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.

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.

We have sent a copy of this ruling to the Taxpayer's authorized representatives pursuant to the Power of Attorney and Declaration of Representative (Form 2848) on file with the IRS. In addition, a copy of this ruling is being sent to the Manager, EP Classification Group 4 in Houston, Texas.

If the Taxpayer wishes to inquire about this ruling, please contact Mr. (ID Badge Number ) at ( ) - .

Sincerely yours,

David M. Ziegler, Manager  
Employee Plans Actuarial Group 2

Enclosures

Notice 437, Notice of Intention to Disclose (Rulings)  
A deleted copy of the ruling

cc: