Significant Index No. 0430.00-00

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

200833027

MAY 20 2008

TAX EXEMPT AND
GOVERNMENT ENTITIES
DIVISION

T:EP:RA:A2

Re:

Plans for which substitute mortality tables are requested ("Permissive Group") =

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 plans in the above Permissive Group 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. 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 herby granted to use the male and female substitute mortality rates shown in the tables below:

Age	Non-Disabled Union Annuitants		Non-Disabled Non-Union Annuitants	
	Males	Females	Males	Females
1	0.0005758	0.0005161	0.0005758	0.0005161
2	0.0003887	0.0003363	0.0003887	0.0003363
3	0.0003227	0.0002513	0.0003227	0.0002513
4	0.0002513	0.0001880	0.0002513	0.0001880
5	0.0002305	0.0001699	0.0002305	0.0001699
6	0.0002206	0.0001591	0.0002206	0.0001591
7	0.0002115	0.0001491	0.0002115	0.0001491
8	0.0001952	0.0001329	0.0001952	0.0001329
9	0.0001889	0.0001265	0.0001889	0.0001265
10	0.0001916	0.0001275	0.0001916	0.0001275
11	0.0001980	0.0001293	0.0001980	0.0001293
12	0.0002061	0.0001338	0.0002061	0.0001338
13	0.0002169	0.0001401	0.0002169	0.0001401
14	0.0002308	0.0001479	0.0002308	0.0001479
15	0.0002444	0.0001568	0.0002444	0.0001568
16	0.0002580	0.0001641	0.0002580	0.0001641
17	0.0002735	0.0001715	0.0002735	0.0001715
18	0.0002871	0.0001752	0.0002871	0.0001752
19	0.0003007	0.0001762	0.0003007	0.0001762
20	0.0003134	0.0001762	0.0003134	0.0001762
21	0.0003260	0.0001762	0.0003260	0.0001762
22	0.0003359	0.0001781	0.0003359	0.0001781
23	0.0003459	0.0001817	0.0003459	0.0001817
24	0.0003522	0.0001864	0.0003522	0.0001864
25	0.0003576	0.0001929	0.0003576	0.0001929
26	0.0003668	0.0002015	0.0003668	0.0002015
27	0.0003725	0.0002099	0.0003725	0.0002099
28	0.0003833	0.0002212	0.0003833	0.0002212
29	0.0004018	0.0002335	0.0004018	0.0002335
30	0.0004330	0.0002511	0.0004330	0.0002511
31	0.0004866	0.0002949	0.0004866	0.0002949
32	0.0005481	0.0003362	0.0005481	0.0003362
33	0.0006154	0.0003766	0.0006154	0.0003766
34	0.0006846	0.0004137	0.0006846	0.0004137

Age	Non-Disabled Union Annuitants		Non-Disabled Non-Union Annuitants	
	Males	Females	Males	Females
35	0.0007539	0.0004494	0.0007539	0.0004494
36	0.0008202	0.0004839	0.0008202	0.0004839
37	0.0008816	0.0005189	0.0008816	0.0005189
38	0.0009354	0.0005573	0.0009354	0.0005573
39	0.0009858	0.0006008	0.0009858	0.0006008
40	0.0010365	0.0006546	0.0010365	0.0006546
41	0.0011003	0.0007047	0.0011059	0.0007177
42	0.0012278	0.0008048	0.0012477	0.0007900
43	0.0014190	0.0009551	0.0014619	0.0008688
44	0.0016740	0.0011553	0.0017463	0.0009541
45	0.0019928	0.0014057	0.0021009	0.0010369
46	0.0023753	0.0017061	0.0025246	0.0011225
47	0.0028216	0.0020567	0.0030153	0.0012191
48	0.0033316	0.0024572	0.0035729	0.0014237
49	0.0039053	0.0029079	0.0041955	0.0017314
50	0.0045429	0.0034086	0.0048828	0.0021514
51	0.0050805	0.0039594	0.0050224	0.0022685
52	0.0056579	0.0045603	0.0051017	0.0024668
53	0.0062790	0.0052112	0.0051722	0.0027254
54	0.0069483	0.0059123	0.0052400	0.0030337
55	0.0076700	0.0066633	0.0053649	0.0033920
56	0.0084491	0.0071649	0.0055923	0.0038087
57	0.0092904	0.0077286	0.0059146	0.0042765
58	0.0101992	0.0083594	0.0063608	0.0047992
59	0.0111813	0.0090620	0.0069051	0.0053941
60	0.0122435	0.0098421	0.0075610	0.0060465
61	0.0133939	0.0107056	0.0083459	0.0067477
62	0.0146414	0.0116590	0.0091934	0.0074987
63	0.0159971	0.0127095	0.0102056	0.0082984
64	0.0174738	0.0138648	0.0112922	0.0091625
65	0.0190873	0.0151332	0.0125056	0.0101075
66	0.0208567	0.0165240	0.0139264	0.0111305
67	0.0228039	0.0180474	0.0154176	0.0122296
68	0.0249543	0.0197149	0.0169612	0.0134302
69	0.0273366	0.0215401	0.0187365	0.0147779
70	0.0299818	0.0235392	0.0205898	0.0163276
71	0.0329228	0.0257315	0.0227817	0.0180283

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Age	Non-Disabled Union Annuitants		Non-Disabled Non-Union Annuitants	
	Males	Females	Males	Females
72	0.0361942	0.0281404	0.0257265	0.0200524
73	0.0398326	0.0307931	0.0281443	0.0221772
74	0.0438756	0.0337211	0.0308885	0.0242633
75	0.0483627	0.0369609	0.0340027	0.0264891
76	0.0533344	0.0405539	0.0375381	0.0289239
77	0.0588329	0.0445468	0.0415555	0.0316136
78	0.0649026	0.0489907	0.0461267	0.0346137
79	0.0715912	0.0539417	0.0513370	0.0379906
80	0.0789498	0.0594596	0.0572876	0.0418215
81	0.0870342	0.0656076	0.0640973	0.0461955
82	0.0959057	0.0724514	0.0719042	0.0512145
83	0.1056318	0.0800576	0.0808665	0.0569953
84	0.1162875	0.0884932	0.0911629	0.0636723
85	0.1279570	0.0978258	0.1029931	0.0713995
86	0.1407341	0.1081233	0.1165798	0.0803514
87	0.1547239	0.1194558	0.1321701	0.0907240
88	0.1700441	0.1318992	0.1500371	0.1027361
89	0.1868266	0.1455398	0.1704820	0.1166303
90	0.2052185	0.1604760	0.1938385	0.1326751
91	0.2253839	0.1768210	0.2204763	0.1511673
92	0.2475035	0.1947040	0.2508054	0.1724357
93	0.2678363	0.2118120	0.2706980	0.1913994
94	0.2867169	0.2281762	0.2891697	0.2095386
95	0.3041450	0.2437965	0.3062205	0.2268533
96	0.3201209	0.2586730	0.3218504	0.2433434
97	0.3346443	0.2728057	0.3360595	0.2590091
98	0.3477155	0.2861946	0.3488476	0.2738502
99	0.3593343	0.2988396	0.3602148	0.2878669
100	0.3695007	0.3107409	0.3701611	0.3010590
101	0.3782148	0.3218983	0.3786865	0.3134266
102	0.3854765	0.3323118	0.3857910	0.3249697
103	0.3912859	0.3419816	0.3914746	0.3356884
104	0.3956430	0.3509075	0.3957373	0.3455825
105	0.3985477	0.3590896	0.3985791	0.3546520
106	0.4000000	0.3665278	0.4000000	0.3628971
107	0.4000000	0.3732223	0.4000000	0.3703177
108	0.4000000	0.3791729	0.4000000	0.3769138

Age	Non-Disabled Union Annuitants		Non-Disabled Non-Union Annuitants	
	Males	Females	Males	Females
109	0.4000000	0.3843797	0.4000000	0.3826853
110	0.4000000	0.3888426	0.4000000	0.3876324
111	0.4000000	0.3925617	0.4000000	0.3917549
112	0.4000000	0.3955370	0.4000000	0.3950530
113	0.4000000	0.3977685	0.4000000	0.3975265
114	0.4000000	0.3992562	0.4000000	0.3991755
115	0.4000000	0.4000000	0.4000000	0.4000000
116	0.4000000	0.4000000	0.4000000	0.4000000
117	0.4000000	0.4000000	0.4000000	0.4000000
118	0.4000000	0.4000000	0.4000000	0.4000000
119	0.4000000	0.4000000	0.4000000	0.4000000
120	1.0000000	1.0000000	1.0000000	1.0000000

The above tables will be used for all male and female union and non-union annuitants, respectively, in the Permissive Group, except for disabled participants for whom separate mortality tables are permitted to be used under section 430(h)(3)(D) of the Code. The above rates were developed based on an experience study period from January 1, , through December 31, , and were graduated using Lowrie's variation of the Whittaker Henderson graduation method. The base year for the resulting tables is . 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. Separate mortality tables prescribed under section 430(h)(3)(A) of the Code will be used for all nonannuitant participants, and mortality tables prescribed under 430(h)(3)(D) will be used for those disabled participants described in that section.

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 proposed 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 proposed 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 proposed 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 proposed 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 Service or as certified by the enrolled actuary to the satisfaction of the Service, and

(5) The date specified in guidance published in the Internal Revenue Bulletin regarding any replacement 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 proposed 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 the

If you require further assistance in this matter, please contact

Sincerely,

Rhonda Migdail

Rhonda G. Migdail, Acting Manager
Employee Plans Technical