

Pension Benefit Guaranty Corporation

74-10

November 8, 1974

REFERENCE:

[*1] 4007(a). Payment of Premiums. Due Dates

OPINION:

This is in response to your recent letter raising a question as to whether the plan administrator should pay the premiums under Title IV of the Employee Retirement Income Security Act from the assets of the pension trust or from the employer's own assets?

Title IV of the Act imposes the obligation to pay premiums upon the plan administrator. Insofar as Title IV is concerned, it makes no difference whether the plan administrator pays the premiums from plan funds or from employer funds.

Henry Rose
Acting General Counsel