From:
To: RegComments

Subject: Comments on MultiEmployer \$90 B Bailout Bill

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As a pension consultant with over 30 years of experience, I have several suggestions to make.

- I. It is great that the Federal Government is extending the benefits to the pensioners . However, there are SEVERAL shortcomings in the approach all of which can be easily rectified.
- A) Require each fund to undergo a forensic audit of fees paid. Taxpayers need to know that they aren't throwing good money after bad
- B) Each fund should be required to do a 3rd party asset allocation study and manager review to see if better asset allocation and better managers might help with keeping the fund secure.
- C) US Govt. should demand board seats. This is customary in bankruptcy, bailouts, and other banking relationships

Furthermore, Minority and Woman owned firms have had a hard time getting opportunities with MultiEmployer plans. To rectify that:

- 1) Government contracting standards should be applied to any actuarial, asset management, brokerage and consulting engagements that come from this effort. Contact SBA and/or DoD if you need help understanding this.
- 2) Any managers that are funded should be required to disclose the Diversity of their workforce, The newly proposed recommendations of the SEC Asset Management Advisory Committee should be implemented immediately. PBGC has the authority to do this under the current guidelines

It was NEVER the intent of Congress to support the exclusion of small, minority, woman owned actuaries, asset managers, brokers, or consultants. However, unless PBGC takes action, that is exactly what will happen (again).

Dorien Nunez OMNIResearch Wall St. Advantage