

**Justification for OMB approval of no material or nonsubstantive change to  
currently approved information collection 1212-0013**

The Pension Protection Act of 2006 (PPA 2006) changed plan funding rules and the related variable-rate premium (VRP) rules. PBGC's reportable events regulation contains provisions — dealing with waivers, extensions, and reporting thresholds — that refer to the funding and VRP rules. PBGC has developed a proposed rule that would amend the reportable events regulation to accommodate the changes (and make other modifications), but practitioners need guidance about how to apply the existing regulation before the final reportable events rule goes into effect sometime after the beginning of 2010.

Technical Update 09-4 would extend, for 2010, guidance that PBGC previously provided for 2009. The 2010 guidance would be superseded by the final reportable events rule when that becomes effective. The 2009 guidance that would be extended was provided in two prior Technical Updates.

Technical Update 09-1 basically provided for a one-year look-back for determining VRP values for purposes of the reportable events regulation. (One special provision of the 2009 guidance — the “Form 1 extension” — is no longer needed and would not be extended.)

Technical Update 09-3 basically waived reporting of missed quarterly contributions for plans with 1 - 24 participants and provided a simplified reporting option for plans with 25 - 99 participants.