

## **Justification for No Material or Nonsubstantive Change to Currently-Approved Collection**

**AGENCY:** Pension Benefit Guaranty Corporation (PBGC)

**TITLE:** Payment of Premiums (29 CFR Part 4007)

**STATUS:** OMB control number 1212-0009; expires June 30, 2021

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The Pension Benefit Guaranty Corporation (PBGC) is changing the filing instructions for the collection of information relating to the computation and payment of premiums to PBGC under title IV of the Employee Retirement Income Security Act of 1974 (ERISA) for plan years beginning in 2018.

The changes to the currently-approved 2018 instructions are as follows:

- To add a sentence to page 35 of the premium filing instructions to clarify when a particular exemption from the variable rate premium (VRP) applies. Over the past few months we've gotten a number of phone calls from practitioners asking whether a certain transaction that would significantly reduce a plan's VRP qualifies for the exemption we promulgated in our regulations in 2014. There has been enough interest from practitioners that we believe we should provide a clearer explanation of the exemption in the premium filing instructions for this year, 2018, before filings are due on October 15.
- To add a note under "What's New" on page 1 of the instructions letting filers know about the clarification on page 35.
- To update our premium payment instructions on page 2.

All changes are highlighted in the uploaded 2018 instructions.