

**Comment #65 – 8/2/18 – 10:41 a.m.**

Good morning,

I briefly reviewed

**MEASURING PENSION OBLIGATIONS AND DETERMINING PENSION PLAN  
COSTS OR CONTRIBUTIONS  
STANDARD OF PRACTICE**

and I would like to comment on this.

We are a small town of 3500. We offer a small pension to volunteer firemen who have offered their services for 20 years or more to keeping our community safe. This is \$100 per month. The surviving spouse receives \$50. Currently there are 21 people receiving this. Last year's expenses were just under \$25,000.

What you are proposing would enforce onerous administrative fees for our plan. Would you consider an alternative measurement option for small plans with a workable formula? This is taken from Montana law:

***assets in the fund are maintained at a level equal to at least three times but no more than five times the benefits paid by the fund in the previous or current fiscal year, whichever is greater;***

This would be a sensible approach in our situation and others that would qualify and still offer some semblance of reasonableness to determine if a pension plan is soundly funded.

Thank you for your time and consideration,

*Michelle Dyckman*

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