

October 21, 2011

Centers for Medicare and Medicaid Services
U.S. Department of Health and Human Services
Attention CMS-9982-P
P.O. Box 8016
Mail Stop C4-26-05
7500 Security Boulevard
Baltimore, Maryland 21244-1850

Office of Health Plan Standards and Compliance Assistance
Employee Benefits Security Administration
U.S. Department of Labor
Attention RIN 1210-AB52
Room N-5653
200 Constitution Avenue, NW
Washington, DC 20210

Internal Revenue Service
CC:PA:LPD:PR (REG-140038-10)
Room 5205
P.O. Box 7604
Ben Franklin Station
Washington, DC 20044

Re: Proposed Rule for Summary of Benefits, Coverage, and Uniform Glossary

To Whom It May Concern:

I am writing on behalf of the Delta Dental Plans Association ("DDPA") in response to the invitation for comments on the Notice of Proposed Rulemaking ("NPRM") for the "Summary of Benefits and Coverage and the Uniform Glossary" included in the *Federal Register* of August 22, 2011.

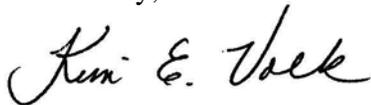
The proposed rule establishes requirements for the disclosure of the summary of benefits and coverage, and a uniform glossary for group health plans and health insurance coverage in the group and individual health insurance markets. We recommend that the agencies add at the end of the requirement a new subsection with respect to "scope and applicability" expressly providing that these requirements do not apply to "excepted benefits".

We also note that we have separately commented on the proposed rule with respect to exchanges that an exchange must be required to tailor the consumer assistance tools and programs to include the business practices for dental benefit coverage. The summary of benefits and

coverage for pediatric dental benefits must be developed by the exchange and must be specific to dental.

We very much appreciate the opportunity to submit comments on this important proposed regulation and your time and attention to the dental-related issues. Please let me or my staff know if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Kim E. Volk". The signature is written in black ink and is positioned above the typed name and title.

Kim E. Volk
President and CEO

Delta Dental is the nation's largest, most experienced dental benefits system. Since 1954, Delta Dental has worked to improve oral health in the U.S. by emphasizing preventive care, and making quality, cost-effective dental benefits affordable to a wide variety of large and small employers and groups. A nationwide system of dental health service plans, Delta Dental offers custom programs and reporting systems that provide employees with quality, cost-effective dental benefit programs and services. Our nationwide network of 39 companies and 135,000 dentists, serves more than 56 million Americans in over 95,700 group plans across the nation.