



February 26, 2018

Mr. Alexander Acosta, Secretary of Labor
U.S. Department of Labor
900 Constitution Avenue, NW
Washington, DC 20210

Re: RIN 1210-AB85 or Docket ID No. 2017-28103 (submitted electronically)

Dear Secretary Acosta:

The Association of TeleServices International (ATSI) is a non-profit professional association of the telephone answering service industry representing over 2,700 telephone answering services (TAS) in the country, which employs 45,000 Americans who handle over 3.6 billion calls annually for other Americans in need of assistance. Our members provide nationwide telephone answering services for all types of industries including: public utilities, public safety offices, crisis centers like rape and suicide hotlines, hospitals and medical centers, and other medical clients. The average answering service business' annual gross revenues are over \$500,000 with razor thin profit margins. Many of these small companies are multi-generational businesses that have served their local communities for decades.

Small businesses constitute the backbone of our national workforce and the increasing cost of health insurance premiums, is a significant financial challenge.. Forming Association Health Plans (AHPs), for membership organizations will allow associations like ATSI to aggregate our members' workforce and leverage more advantageous insurance plans that provide a higher quality of care at a lower premium cost. With the proposed changes, small businesses would be able to offer more competitive benefits, allowing them to compete with large employers and international competitors to retain and recruit employees. The Department of Labor's notice of proposed rulemaking has the potential to increase new health insurance options, which is greatly welcomed by ATSI and our industry.

Association of Teleservices International

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The rule proposes to provide more affordable healthcare insurance options for small businesses by modifying the definition of “employer”. This is essential to enable small businesses to participate in an AHP in the large group market, rather than being forced to purchase in the more costly and volatile individual insurance market. Large group plans typically have more flexibility in plan design and options, which offer greater negotiating power to bargain for lower premiums. These benefits of scale are key to reducing insurance premiums.

The need for affordable health insurance options remains a top concern among our practicing professionals. Allowing working owners to participate in AHPs will offer new options for health insurance coverage, providing much needed relief for the industry and to our members. We also suggest that the proposed rule not impose burdensome and unnecessary requirements on working owners or participants in the AHPs.

ATSI understands that there are many nuances that need to be worked out with the proposed change to section 3(5) of the Employee Retirement Income Security Act (ERISA) however, that should not delay the opportunity to provide long needed relief to small businesses.

We welcome the Department’s proposed regulations since we believe that AHPs can help provide higher quality employee benefits at lower costs, especially for small employers who have fewer choices every plan year.

ATSI appreciates this opportunity to comment, and are willing to assist in this effort in any way we can.

Sincerely,

Josue Leon, President
Association of TeleServices International