



TOPIC: **Proposed Regulations on Multiemployer Zone Status and Certification under Section 432 of the Internal Revenue Code**

EXECUTIVE SUMMARY:

ON MARCH 18, 2008 THE IRS ISSUED PROPOSED REGULATIONS TO PROVIDE FUNDING GUIDANCE FOR MULTIEMPLOYER PLANS UNDER IRC SECTION 432. THE NCCMP HAS BEEN ENGAGED IN THE DEVELOPMENT OF OUR COMMENTS WHICH ARE DUE TO BE FILED ON MONDAY JUNE 16, 2008. AN OUTLINE OF THE ISSUES TO BE ADDRESSED IN SUCH COMMENTS IS ATTACHED FOR YOUR REVIEW AND TO OBTAIN YOUR INPUT IN PREPARING THE FINAL COMMENT SUBMISSION. PLEASE SUBMIT ANY SUGGESTIONS YOU WOULD LIKE TO SEE INCORPORATED BY CLOSE OF BUSINESS ON FRIDAY, JUNE 13, 2008.

YOU WILL NOTE THAT THESE COMMENTS OMIT ANY MENTION OF THE TREATMENT OF AMORTIZATION EXTENSIONS UNDER THE PREVIOUS CODE SECTION 412(E). WE RESPECT THAT POSITIONS ON BOTH SIDES OF THIS ISSUE HAVE BEEN TAKEN BY OUR MEMBERS AND EXPECT SEVERAL WILL COMMENT DIRECTLY ON THE SERVICE'S POSITION WITH RESPECT TO THAT TOPIC.

PURPOSE: SOLICITATION OF COMMENTS

CATEGORY: NOTICE OF PROPOSED RULE MAKING (NPRM)

ISSUER: INTERNAL REVENUE SERVICE

TARGET AUDIENCE: TRUSTEES AND PROFESSIONAL ADVISORS TO DEFINED BENEFIT PENSION PLANS

INPUT REQUESTED: FEEDBACK REGARDING ISSUES PROPOSED TO BE ADDRESSED

OFFICIAL COMMENT PERIOD ENDS: CLOSE OF BUSINESS MONDAY, JUNE 16, 2008

NCCMP DEADLINE: CLOSE OF BUSINESS, FRIDAY, JUNE 13, 2008

FORWARD COMMENTS TO: Multi-Elert@nccmp.org

REFERENCE: VOL.8, ISSUE 3

FOR ADDITIONAL BACKGROUND SEE: FEDERAL REGISTER NOTICE DATED MARCH 18, 2008 (ATTACHED) RE: **MULTIEMPLOYER PLAN FUNDING GUIDANCE**