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December 4, 2018

VIA UPS OVERNIGHT DELIVERY

Department of the Treasury
Attn: Danielle Norris
MPRA Office, Room 1224
1500 Pennsylvania Avenue, NW
Washington, DC 20220

RE: Western Pennsylvania Teamsters & Employer Pension Plan
Submission Date: September 24, 2018

Dear Ms. Norris:

My name is Bill Lickert. I was appointed by the Board of Trustees of the Western Pennsylvania Teamsters and Employers Pension Fund to serve as the Retiree Representative pursuant to the Kline-Miller Multiemployer Pension Reform Act (MPRA). As the Retiree Representative, it is my responsibility to be the voice of roughly 17,000 retirees and deferred vested participants whose pension benefits may be affected by the Pension Fund's application to reduce benefits. Please accept this letter as my comment on the MPRA application submitted by the Pension Fund's Board of Trustees on September 24, 2018.

The Board of Trustees' MPRA application proposes an across the board reduction of 30% of benefits accrued through December 31, 2017 unless you are a participant actively employed at a "Top Tier" contribution level as of January 1, 2018, in which case a "Special Benefit level" (effectively a floor) may result in a pension cut of less than 30%. As proposed, none of my constituents can benefit from the "Special Benefit level" proposal. Instead, my constituents are faced with a straight 30% reduction to their pensions.

For the last year and a half I have interacted with individuals on a daily basis who will suffer hardships if their benefits are reduced. Many have informed me that they fear they will be forced to find new residences because the benefit cuts will make it difficult for them to afford their current arrangements. Others have told me that they can barely make ends meet as it is. These benefit cuts will leave them in the position where they have to worry if they can even afford food and necessities. Having worked a full career as contributing members of society it is abhorrent that these people may have to scramble to make basic ends meet in their elderly years. Without question a 30% reduction will dramatically alter the lives of many of these retirees.

Additionally, I have heard from many constituents who feel it is unfair to provide a "Special Benefit level" only for participants active in covered employment as of January 1, 2018. Some retirees may have worked their entire career at the "Top Tier" contribution level but they will nonetheless face the full 30% reduction simply because they retired before January 1, 2018. Due to the considerable feedback I have heard opposing the "Special Benefit level" proposal, I cannot agree with this aspect of the Board of Trustees' proposed benefit suspension.

I have also heard from many constituents who are disabled and cannot return to work. Since the Board of Trustees eliminated disability pensions in 2011, many of these individuals are not receiving a disability pension and they will not benefit from the MPRA provisions protecting disability benefits. I am simply unable to explain the logic of the protecting the "Special Benefit" for active employees to these disabled retirees facing a 30% pension cut and who are not able to return to work.

I also realize, however, that the failure to take any action now to save the Pension Fund will most likely result in the Pension Fund becoming insolvent. And, absent a legislative solution to the PBGC's multiemployer program's pending insolvency, my constituents could end up with no Pension Fund benefit and no federal guarantee if the Board of Trustees' MPRA application is rejected. While I would have preferred a benefit reduction proposal that included a straight, across the board benefit reduction which applied equally to all participants and beneficiaries, the cold logic demanded by the circumstances confronting us causes me to state my support for the Board of Trustees' MPRA application.

Thank you for your time.

Sincerely,



Bill Lickert,
Retiree Representative,
Western PA Teamsters & Employers
Pension Fund

cc: Board of Trustees (c/o Vincent P. Szeligo, Esq., via email)