Co-Chairs:
Mr. John G. Kapanke
Ms. Barbara A. Boigegrain

Co-Secretary/Treasurer:
Robert H. Rydland, Esquire
Sarah S. Hirsen, Esquire

Board of Pensions
Evangelical Lutheran Church in America
800 Marquette Avenue, Suite 1050
Minneapolis, MN 55402-2892
(612) 752-4117 • Fax (612) 334-5399

Members:

Dr. K. Young Bae
Association of Unity Churches

Mr. J. Paul Bell
Associate Reformed Presbyterian Church

Ms. Barbara A. Boigegrain *
United Methodist Church

Mr. John H. Bolt
Christian Reformed Church in North America

Rev. Kenneth Bradsell
Reformed Church in America

Mr. David J. Brown
Community of Christ

Mr. Gary D. Campbell
Presbyterian Church in America

Mr. Elford H. Clark
International Church of the Foursquare Gospel

Mr. Michael A. Downs *
United Church of Christ

Mr. Nevin Dulabaum
Church of the Brethren

Dr. Craig A. Dunn
Wesleyan Church

Mr. Jon M. Flanagan
Wisconsin Evangelical Lutheran Synod

Dr. Sumner M. Grant *
American Baptist Churches

Mr. James P. Hamlett *
Christian Church (Disciples of Christ)

Dr. O. S. Hawkins *
Southern Baptist Convention

Mr. Dale Hill
Free Methodist Church of North America

Mr. Gerald B. Hindy
Assemblies of God

Mr. Jeffrey A. Jenness
Board of Pensions of the Church of God

Rev. Dr. Jeffrey J. Jeremiah
Evangelical Presbyterian Church

Mr. Del L. Johnson
General Conference of Seventh-Day Adventists

Mr. John G. Kapanke *
Evangelical Lutheran Church in America

Mr. Mario J. Kauffman
Mennonite Church

Mr. Robert M. Koppel *
Reform Pension Board

Mr. Ray Lewis
National Association of Free Will Baptists

Dr. Dean A. Lundgren
Evangelical Covenant Church

Mr. Robert W. Maggs, Jr.*
Presbyterian Church (U.S.A.)

Rev. Ross I. Morrison
Evangelical Free Church of America

Mr. John M. Preis *
Young Men's Christian Association

Br. Michael F. Quirk, FSC *
Christian Brothers Services

Mr. Arthur D. Rhodes
Church of God Benefits Board

Mr. James F. Sanft *
Lutheran Church-Missouri Synod

Mr. Stephen Schultz
Baptist General Conference

Mr. Mitchell J. Smilowitz
Joint Retirement Board for
Conservative Judaism

Mr. Ray D. Stites
Christian Churches Pension Plan

Mr. T. Dennis Sullivan *
Episcopal Church

Mr. James P. Thomas, CPA
Churches of God, General Conference

Rev. Don L. Walter
Church of the Nazarene

* Steering Committee Members

020111

CHURCH ALLIANCE

Acting on Behalf of Church Benefits Programs

Counsel:
K&L Gates LLP
1601 K Street NW
Washington D.C. 20006
Tel (202) 778-9000
Fax (202) 778-9100

October 4, 2011

Ms. Sarah Josephson
Senior Counsel to the Chairman
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

Mr. Timothy A. Karpoff
Counsel to the Chairman
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

Ms. Phyllis Cela
Chief Counsel, Division of Enforcement
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

Dear Sarah, Tim, and Phyllis:

On behalf of the Church Alliance, I would like to thank you and your colleagues for meeting with me, Andy Hendren, and Karishma Page on September 9, 2011. We appreciated the opportunity to discuss with you the unique issues impacting church plans.

In follow up to our discussion, please find attached two items. First, attached is a document that discusses a possible rule that would allow for church plans to opt-in to Special Entity status. Second, attached is a document that provides draft language to clarify the status of church plans and that discusses the legal and historical background of church plans.

Feel free to share with the appropriate individuals. We are also submitting these items electronically.

Please do not hesitate to be in touch with questions or for additional information. Thank you for your consideration and for your help in assuring that individuals who dedicate their lives to working for religious institutions are not disadvantaged in terms of the treatment of their employee benefits.

Sincerely,

Lawrence B. Patent
Of Counsel, K&L Gates
On Behalf of the Church Alliance

CC:

Mr. David Stawick, Secretary, Commodity Futures Trading Commission
Mr. Mark Fajfar, Assistant General Counsel, Office of the General Counsel, Commodity Futures Trading Commission
Ms. Eileen Donovan, Special Counsel, Division of Clearing and Intermediary Oversight, Commodity Futures Trading Commission
Mr. Erik Remmler, Special Counsel, Division of Clearing and Intermediary Oversight, Commodity Futures Trading Commission
Ms. Lourdes Gonzalez, Assistant Chief Counsel, Division of Trading and Markets, Securities and Exchange Commission
Ms. Cindy Oh, Attorney-Advisor, Division of Trading and Markets, Securities and Exchange Commission