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CHURCH ALLIANCE

Acting on Behalf of Church Benefits Programs

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October 4, 2011

Ms. Sarah Josephson
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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,

A handwritten signature in black ink, appearing to read "Lawrence B. Patent". The signature is fluid and cursive, with a large loop at the end.

**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,
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