

### **Affiliated Computer Services**

#### **401(k) Services**

**2. Has your company added significant new capabilities that are applicable to 401(k) plans? Yes  
If yes, what are they?**

ACS has invested in technology to engage our clients' participants where it makes the most sense for them. Now our technology and applications can be accessed by any user, regardless of the device they use ( iPhone, iPad, Blackberry, and other mobile devices). Available functionality includes:

- Viewing and transactional capabilities of accounts
- Push notifications
- GPS integration
- Multiple languages
- Mobile printing
- Service-center connections

### **American United Life Insurance**

#### **401(k) Services**

**2. Has your company added significant new capabilities that are applicable to 401(k) plans? Yes  
If yes, what are they?**

- Trust-based defined-contribution program
- ERISA accounts
- Gross-to-net pricing
- Consulting capabilities (particularly defined-benefit and ESOP expertise)
- True open-architecture platform

### **Ascensus**

#### **Call-center service: How well have the centers performed?**

AscentData, a nationally recognized leader in client-satisfaction surveying, has been tracking our client satisfaction for more than nine years. AscentData surveys more than 10,000 of our clients annually, receiving 2,500 to 3,000 responses. Client satisfaction is measured on a 7-point scale across numerous services, and a result above 6.0 is considered highly favorable. Our Participant Service Representative support scored 6.25.

Ascensus, cont.

401(k) Services

2. **Has your company added significant new capabilities that are applicable to 401(k) plans? Yes**  
**If yes, what are they?**

The Ascensus Investment Fiduciary Program, in partnership with Mesirow Financial, offers fiduciary protection to plan sponsors and commission-based advisers.

**Bank of America Merrill Lynch**

Call-center service: How well have the centers performed?

In 2011, Retirement & Benefit Plan Services's contact centers were recognized for customer-satisfaction excellence under the J.D. Power and Associates Certified Call Center Program for the seventh consecutive year (2005–2011). According to an evaluation by the global marketing information services firm, the contact center operation has a strong commitment to providing an “outstanding customer-service experience.” We are the first retirement contact center to be certified.

401(k) Services

2. **Has your company added significant new capabilities that are applicable to 401(k) plans? Yes**  
**If yes, what are they?**

**Benefits OnLine enhancements**

We redesigned the plan-enrollment process on our Benefits OnLine participant Website, offering new screens and features that enable clients' employees to join the plan more quickly and easily than ever before.

**New stable-value fund offerings**

In keeping with our open-architecture service model and desire to provide clients with alternatives, we now offer the following stable-value fund offerings for defined-contribution plan clients:

- **Invesco Stable Value Retirement Trust\***: Plans may initially deposit up to \$150 million in the fund. Advance notice is required for plan-level withdrawals, and withdrawals may be delayed up to 12 months at the investment manager's discretion.
- **Wells Fargo Stable Return Fund**: Plans may initially deposit up to \$100 million in the fund. Advance notice is required for plan-level withdrawals, and withdrawals may be delayed up to 12 months at the investment manager's discretion.
- **Federated Capital Preservation Fund**: Plans may initially deposit up to \$100 million in the fund. Advance notice is required for plan-level withdrawals, and withdrawals may be delayed up to 12 months at the investment manager's discretion.
- **Prudential Stable Value Fund**: A \$20 million minimum deposit is required. Thirty-day advance notice is required for plan-level withdrawals.

*\* Invesco Stable Value Retirement Trust is a new fund created exclusively for Bank of America Merrill Lynch clients. Clients are advised to contact their Bank of America Merrill Lynch representative or financial adviser for details.*

## Bank of America Merrill Lynch, cont.

### Regulatory Action Disclosures

#### **2. Has the company been investigated or are you being investigated for any issues by any outside agencies? No**

Retirement & Benefit Plan Services—the Bank of America Merrill Lynch business unit that administers 401(k) plans—is not involved in pending material investigations related to the services we provide.

Bank of America and certain of its subsidiaries (including Merrill Lynch, Pierce, Fenner & Smith Inc.) have been named as defendants in civil actions and have been involved in various regulatory inquiries arising out of their respective business activities.

All material litigation is reported in the Bank of America annual form 10-K report, filed with the U.S. Securities and Exchange Commission. In addition, Bank of America reports all material regulatory matters on Schedule D of Form B-D filed with the SEC.

## **BB&T Retirement & Institutional Services**

### Call-center service: How well have the centers performed?

For 2010, our call center met all service-standard requirements, averaging a service level of 97.7% and a speed-of-answer time of 14 seconds. Call-center capacity and response times are strictly monitored to ensure that each call-center representative adheres to our quality-assurance standards and delivers quality service, including timeliness, to plan participants. Minimum service-level standards of our call center include:

- <30 seconds average speed of answer
- <5% call-abandonment rate
- Callbacks from voice-mail messages are made by the end of the same business day
- Calls are logged daily and monitored randomly by supervisory personnel to ensure transactions and information requests are handled within a 24-hour time frame

## **Charles Schwab**

### 401(k) Services

#### **2. Has your company added significant new capabilities that are applicable to 401(k) plans? Yes If yes, what are they?**

- **Extended participant-transaction history:** Increased the amount of transaction history available online for viewing and for personal rate-of-return calculations from 2 years to 10 years of history.
- **Imaging system:** Schwab recently rolled out an integrated suite of applications that enhance our current imaging and workflow of paper-based forms. Once Schwab scans the documents into our system, the scanned images are then routed electronically through a systematic workflow system for efficient processing. At that time, the images are archived and can be easily retrieved for participant inquiries. Images are also available for inquiries requested by plan sponsors or their auditors.

## Charles Schwab, 401(k) Services, cont.

- **Industry and retirement-plan benchmarking:** Continued enhancement of Schwab's tools for comparing plan design and features to other plans at Schwab and within specific industries. This helps Schwab bring additional value to clients by providing proactive plan-design opportunities and best-practice recommendations, based on our extensive experience in working with similar clients and plans. Our proactive consulting efforts have resulted in increased contributions levels, improved testing results, additional tax-deferred contribution opportunities, and reduced plan costs.

## Regulatory Action Disclosures

### **1. Is your company involved in litigation regarding fees, fee disclosures, or revenue sharing? Does your company intend to change its policies regarding these issues?**

Due to the diverse nature and size of its business, The Charles Schwab Corp., its broker-dealer subsidiary Charles Schwab & Co. Inc., and its various other subsidiaries and affiliates (including Schwab Retirement Plan Services Inc.; Schwab Retirement Plan Services Co.; and Charles Schwab Trust Co., a division of Charles Schwab Bank) is routinely subjected to claims, lawsuits, arbitrations, regulatory examinations, requests for information, and other proceedings in the ordinary course of its business. Most of such proceedings involve business entities other than Schwab Retirement Plan Services Inc., Schwab Retirement Plan Services Co., and Charles Schwab Trust Co.

### **2. Has the company been investigated or are you being investigated for any issues by any outside agencies?**

Due to the diverse nature and size of its business, The Charles Schwab Corp., its broker-dealer subsidiary Charles Schwab & Co. Inc., and its various other subsidiaries and affiliates (including Schwab Retirement Plan Services Inc.; Schwab Retirement Plan Services Co.; and Charles Schwab Trust Co., a division of Charles Schwab Bank) is routinely subjected to claims, lawsuits, arbitrations, regulatory examinations, requests for information, and other proceedings in the ordinary course of its business. Most of such proceedings involve business entities other than Schwab Retirement Plan Services Inc., Schwab Retirement Plan Services Co., and Charles Schwab Trust Co.

### **3. Has the company been involved or are you involved in any ethical investigations?**

Due to the diverse nature and size of its business, The Charles Schwab Corp., its broker-dealer subsidiary Charles Schwab & Co. Inc., and its various other subsidiaries and affiliates (including Schwab Retirement Plan Services Inc.; Schwab Retirement Plan Services Co.; and Charles Schwab Trust Co., a division of Charles Schwab Bank) is routinely subjected to claims, lawsuits, arbitrations, regulatory examinations, requests for information, and other proceedings in the ordinary course of its business. Most of such proceedings involve business entities other than Schwab Retirement Plan Services Inc., Schwab Retirement Plan Services Co., and Charles Schwab Trust Co.

## **CPI Qualified Plan Consultants**

### Call-center service: How well have the centers performed?

In quarterly performance surveys returned by plan sponsors, the participant service center consistently receives high marks. Feedback from participants is consistently positive.

## **DWS Investments**

### **401(k) Services**

- 2. Has your company added significant new capabilities that are applicable to 401(k) plans? Yes**  
**If yes, what are they?**

Our RolloverCentral gives participants who are leaving their jobs the ability to quickly and conveniently roll their retirement plan assets into a DWS Traditional or Roth IRA online. As part of the online account setup process, participants can name their employer as their financial adviser—enabling the employer to retain the assets.

Other benefits of DWS RolloverCentral include:

- **No cost:** There is no fee for plans to offer this service.
- **Easy setup:** DWS accounts can be established online in as little as 15 minutes.
- **Comprehensive education:** The system provides access to a range of helpful resources and tools.

## **Employee Fiduciary**

### **Call-center service: How well have the centers performed?**

In 2010, more than 95% of calls were answered within service standards—immediately, returned within the same business day, or returned by noon the next business day (for calls received after 4:00 p.m.).

## **EPIC Advisors**

### **401(k) Services**

- 2. Has your company added significant new capabilities that are applicable to 401(k) plans? Yes**  
**If yes, what are they?**

EPIC partnered with Mutual of Omaha to make available a group annuity product as a plan investment alternative. Additionally, we partnered with Stadion to provide a QDIA Managed Account product that may be used with either the Mutual of Omaha group annuity product or in an open-architecture mutual-fund environment.

- 4. Is the company owned by, does it own, or is it an affiliate of a company(ies) that advises 401(k) plans? If yes, which one.**

EPIC Advisors is a wholly-owned subsidiary of NBT Bancorp Inc. Investment management and adviser services are available from NBT Bancorp to 401(k) plans. NBT Bank also provides discretionary trustee services to its 401(k) plan clients.

## **ePlan Services**

### **401(k) Services**

**2. Has your company added significant new capabilities that are applicable to 401(k) plans? Yes  
If yes, what are they?**

- Employee rollover center (including Roth rollovers)
- eFAST2 credentialing process
- Electronic Form 5500 filing solution
- Exclude HCE/Key employees from safe-harbor contributions
- Eligible automatic contribution arrangement (EACA)
- VRU-based employee enrollment
- Enhanced reporting: eligible employees
- New format for participant statement
- Expanded plan-level investment options to 30 funds
- Expanded investment option performance reporting

## **ExpertPlan**

### **Call-center service: How well have the centers performed?**

Our performance statistics for 2010:

- Average speed of answer: 22 seconds
- Call-abandonment rate: 4.5%
- Calls answered: 47,040
- E-mails received: 41,212

### **401(k) Services**

**1. Has your company merged with or acquired another 401(k) provider in the past year? Yes  
If yes, which one(s)?**

In June 2010, ExpertPlan acquired Redwood Administrators Inc., a TPA firm specializing in retirement-plan design consulting, new comparability plans, one person 401(k) plans, and other traditional defined-contribution or defined-benefit plans.

**2. Has your company added significant new capabilities that are applicable to 401(k) plans? Yes  
If yes, what are they?**

### **ExpertPlan, 401(k) Services, cont.**

In addition to defined-contribution/defined-benefit and insurance-based products, as well as trust and benefit services software solutions, since June 2010, ExpertPlan has offered a complete range of consulting, research, administrative, and communication services throughout the field of qualified and nonqualified plans. By aligning two wholly-owned subsidiaries, Redwood Administrators and Actuarial Enterprises, ExpertPlan has established ExpertPlan Consulting Services (a division of ExpertPlan). Consulting services include:

- Complete document services
- IRS and DOL self-correction programs
- Retroactive recordkeeping, administration, and regulatory filings
- Fiduciary consulting and protection services
- Plan transactional services
- Complex ownership structures
- Company stock or nontraditional investments
- Nonqualified plans
- Actuarial services
- TPA outsourcing
- Client education

## **Fidelity Investments**

### **401(k) Services**

- 2. Has your company added significant new capabilities that are applicable to 401(k) plans? Yes**  
**If yes, what are they?**

We now offer guidance through our “Income Strategy Evaluator,” which helps investors shift from saving for retirement to spending in retirement. The ISE tool allows an investor to identify a retirement income investing strategy, and to compare how it could perform under various market conditions. The tool provides guidance on how to achieve income diversification, and gives detailed suggestions on what types of investments to consider, in what amounts, and from what type of account to generate the needed income. To do this, the tool factors in the investor’s estimated needs, investing preferences, estimated taxes, current savings, and other expected income sources, among other things.

## **Guardian Insurance & Annuity**

### **Call-center service: How well have the centers performed?**

We received the 2010 Seal of Excellence for Transaction Processing, as well as the 2010 Recognition of Excellence in Call Center Support to Financial Intermediaries for 401(k) products. We were also recently awarded the J.D. Power and Associates Call Center Certification.

## **ING U.S. Retirement Services**

### **Call-center service: How well have the centers performed?**

Approximately 87% of callers were satisfied with our call-center associates' courteousness, professionalism, quality of service, and ability to explain information in a clear manner. Our call center also met or exceeded its 2010 goals for resolution of participant inquiries within the first call.

### **401(k) Services**

#### **2. Has your company added significant new capabilities that are applicable to 401(k) plans? Yes If yes, what are they?**

ING continues to expand our offering of fiduciary tools to provide high-quality support in helping plan sponsors meet their fiduciary obligations. We also launched [ing401kinfocenter.com](http://ing401kinfocenter.com), which provides a comprehensive suite of dedicated tools and resources that help plan sponsors more easily manage their plans and maintain compliance standards.

## **Invest n Retire**

### **401(k) Services**

#### **2. Has your company added significant new capabilities that are applicable to 401(k) plans? Yes If yes, what are they?**

- Dalbar Certified 3(38) investment managers
- Integration of Ceridian payroll files directly to Invest n Retire
- Automation of ACH to companies bank account when payroll file is received
- E-mail alerts to plan sponsor and TPA when a potential mistake is detected

## **MassMutual Financial Group**

### **Call-center service: How well have the centers performed?**

In the 2010 Top Performers in the Contact Center Industry Awards, MassMutual earned gold awards for the Americas Region in three categories:

- Best Contact Center (Medium Size)
- Best Customer Service Practices Panel Presentation
- Best Customer Service Representative (Danielle Baker, in our Retirement Services Call Center)

The Top Performers awards are sponsored by ContactCenterWorld, a global association for customer-service contact center best-practices. This is the second consecutive year that MassMutual has been recognized by ContactCenterWorld as a top performer in delivering outstanding customer service.

**MassMutual Financial Group, cont.**

**401(k) Services**

- 2. Has your company added significant new capabilities that are applicable to 401(k) plans? Yes**  
**If yes, what are they?**

- Completely redesigned our participant Website (now called RetireSmart)
- Launched Facebook page (<http://www.facebook.com/retiresmart>)
- Launched an interactive Facebook game that “ages” participants to help them see what life may look like down the road (<http://www.retiresmartmoves.com/>)

**Mercer**

**401(k) Services**

- 2. Has your company added significant new capabilities that are applicable to 401(k) plans? Yes**  
**If yes, what are they?**

We enhanced our participant Website with personalized retirement-assessment and -modeling tools, messaging, chat capabilities, and an interactive resource center. The Website also contains content in Spanish. In addition, we also have holistic financial planning and advice integration, which includes the introduction of Financial Engines Income+ (mid-2011).

**Nationwide Financial**

**401(k) Services**

- 2. Has your company added significant new capabilities that are applicable to 401(k) plans? Yes**  
**If yes, what are they?**

We have made significant enhancements to our Websites, including the introduction of the On Your Side Interactive Retirement Planner (a calculator to help participants understand whether they are on-track for retirement), revisions to our retirement plans landing page, and a new rollover education Website. Additionally, we have increased our participant call-center capabilities by empowering call-center representatives to execute participant exchanges via the phone.

**Regulatory Action Disclosures**

- 1. Is your company involved in litigation regarding fees, fee disclosures, or revenue sharing? Yes**  
**Does your company intend to change its policies regarding these issues? NA**

See the response to the next question.

## **Nationwide Financial, Regulatory Action Disclosures, cont.**

### **2. Has the company been investigated or are you being investigated for any issues by any outside agencies?**

The financial-services industry has been the subject of increasing scrutiny, on a broad range of issues, by regulators and legislators. Nationwide Financial Services Inc. and its subsidiaries (collectively, the Company), and/or its affiliates, have been contacted by, have self-reported, or have received subpoenas from state and federal regulatory agencies and other governmental bodies, state securities law regulators, and state attorneys general for information relating to, among other things, compensation, revenue-sharing and bidding arrangements, market-timing, anticompetitive activities, unsuitable sales or replacement practices, fee arrangements in retirement plans, and the use of side agreements and finite reinsurance agreements. The Company is cooperating with regulators in connection with these inquiries and will cooperate with Nationwide Mutual Insurance Co. in responding to these inquiries to the extent that any inquiries encompass NMIC's operations.

## **The Newport Group**

### **Call-center service: How well have the centers performed?**

Our plan-sponsor clients consistently give high ratings to our participant call center, and it has received "Best In Class" awards for the past three years from independent third parties.

## **401(k) Services**

### **2. Has your company added significant new capabilities that are applicable to 401(k) plans? Yes If yes, what are they?**

We continually introduce new administrative services and technology capabilities to our clients. For example, in 2010 we released a Web-based Wealth Dashboard that aggregates information from all of a participant's personal financial accounts into a single, consolidated view. All of a participant's assets and liabilities are shown at a glance, and the participant can view his/her entire net worth, account balances, and holdings—all of which are updated every business day.

## **New York Life Retirement Plan Services**

### **Call-center service: How well have the centers performed?**

In the 2010 Anova Consulting Group plan-sponsor survey, 100% of the clients surveyed indicated they were satisfied with the service they received from our participant-service-center representatives. We do not place standards on the number and length of calls, as we encourage our representatives to take as much time as needed on any phone call to properly service the participant. It is not our policy to "rush" participants off of the phone in order to obtain lower average talk times. We place an emphasis on the quality of phone calls, not the quantity.

## New York Life Retirement Plan Services, cont.

### 401(k) Services

#### **2. Has your company added significant new capabilities that are applicable to 401(k) plans? Yes If yes, what are they?**

We recently launched our new participant Website, [www.mylife.newyorklife.com](http://www.mylife.newyorklife.com), featuring a simple, friendly, and intuitive interface. On the site, the My Learning Center uses targeted-messaging strategies and includes proprietary educational content, instant plan checkups, and online advice.

In addition, we now have an extended advice offering for participants who are close to retirement. This offering shows participants how to manage their retirement assets during their retirement years. The Retirement Income Advisor software tool, designed in collaboration with Morningstar, captures all assets earmarked for retirement, including the 401(k) balance, pension assets, IRAs, Social Security, and other accounts (including spousal assets). The tool provides recommendations on how much can be spent each year in retirement.

## **Principal Financial Group**

### 401(k) Services

#### **2. Has your company added significant new capabilities that are applicable to 401(k) plans? Yes If yes, what are they?**

- **RetireView:** An asset-allocation service that permits the financial professional to customize and populate a target-date/target-risk strategy with the investment options available to the retirement plan
- **Expanded investment platform:** Added investment options on our sub-advised and mutual-fund-network investment platforms
- **Small-plan market:** Tailored price and packaging of services to be more targeted to the small-plan market needs
- **Asset-liability modeling:** Enhanced our consulting capabilities for defined-benefit plans, including creating an ALM study specific to the needs of hard-frozen defined-benefit plans with an intent to terminate
- **Principal Retirement Income Edge:** Created and launched a retirement-education portal to provide an easy-to-use tool for finding investor-facing materials related to income planning
- **Form 5500 tools:** Invested in technology to help clients effectively navigate and meet the Form 5500 requirements, including a streamlined electronic-data-collection process, viewing and editing of forms online, ERISA 403(b) support, and an automated processing capability for a large percentage of plans
- **Retirement plan-sponsor Website refresh:** Unveiled a new look and feel for the plan-sponsor Website, with improved navigation, more plan-specific content, and new reports and resources

### Regulatory Action Disclosures

#### **2. Has the company been investigated or are you being investigated for any issues by any outside agencies?**

## **Principal Financial Group, Regulatory Action Disclosures, cont.**

Yes. Regulatory bodies (such as state insurance departments, the Securities and Exchange Commission, the National Association of Securities Dealers, and the Department of Labor) regularly make inquiries and conduct examinations or investigations concerning our compliance with, among other things, insurance laws, securities laws, ERISA, and laws governing the activities of broker dealers. We also receive requests from regulators and other governmental authorities relating to other industry issues and may receive additional requests, including subpoenas and interrogatories, in the future.

## **Prudential Retirement**

### **Regulatory Action Disclosures**

**1. Is your company involved in litigation regarding fees, fee disclosures, or revenue sharing? Yes  
Does your company intend to change its policies regarding these issues? Yes**

As a major financial institution, we and our affiliates are subject to litigation in the normal course of our business, none of which in any manner restricts, limits, or affects our ability to provide services to retirement plans. In the last five years, there has been no material litigation arising from Prudential Retirement's defined-contribution business. As a public company, Prudential generally discloses material litigation affecting its businesses through filings with the Securities and Exchange Commission. For additional information about these matters, please see Prudential's SEC filings at [www.investor.prudential.com](http://www.investor.prudential.com).

Prudential Retirement's policy is to inform plan sponsors and plan participants of the amount of all investment-management and other fees associated with the investment options it makes available, as well as the amount of any per-participant charges and transaction charges imposed. We believe that our disclosures comply with all applicable laws and regulations. We are aware of the Department of Labor's and Congress's activity on the subject of fee disclosure. We do not think those activities are inconsistent with our existing policy. To the extent modifications to how we implement our policy become necessary because of changes in applicable laws or regulations, we will make those changes.

**2. Has the company been investigated or are you being investigated for any issues by any outside agencies? Yes**

As a major financial institution, we and our affiliates are subject to governmental and regulatory reviews and inquiries and other legal proceedings in the normal course of our businesses, which in no manner restrict, limit, or affect our ability to provide services to retirement plans. In the last five years, there has been no material litigation arising from Prudential Retirement's defined-contribution business. As a public company, Prudential generally discloses material litigation concerning its businesses through filings with the Securities and Exchange Commission. For additional information about these matters, we refer you to Prudential Financial's SEC filings, which can be accessed at [www.investor.prudential.com](http://www.investor.prudential.com).

**3. Has the company been involved or are you involved in any ethical investigations? Yes**

Prudential, being a large financial-services organization, is frequently subject to regulatory examinations by regulators and governmental authorities. As a public company, Prudential generally discloses material matters concerning its businesses through filings with the Securities and Exchange Commission. For additional information about these matters, please see Prudential Financial's SEC filings at [www.investor.prudential.com](http://www.investor.prudential.com).

## **Retirement Alliance**

### **Call-center service: How well have the centers performed?**

Retirement Alliance receives approximately 10,000 participant calls annually, and the average length of calls is just under 5 minutes. On average, Retirement Alliance service-center representatives answer calls by the second ring and our call-abort rate is less than 6%. Less than 2% of our calls require follow-up.

### **401(k) Services**

#### **2. Has your company added significant new capabilities that are applicable to 401(k) plans? Yes If yes, what are they?**

- **SmartPlan Enterprise:** Award-winning, video-based employee-enrollment and communication module
- **My Money Mobile:** Smartphone applications for Droid and Apple for “on the run” participant access
- “New & Improved” corporate Website with sponsor and participant resource centers
- **Automated SCHARP Payroll Processing:** Flexible payroll “scrubber” tool
- Secure FTP document transfer technology for safe file exchanges
- Participant E-statements

## **Securian Financial Group**

### **401(k) Services**

#### **2. Has your company added significant new capabilities that are applicable to 401(k) plans? Yes If yes, what are they?**

- New 3(38) investment service (available through a strategic alliance with an independent investment advisory firm) to offer plan sponsors an investment-liability-transfer solution designed to significantly reduce their fiduciary liability
- New investment options
- New online-reporting functionality

## **Sentinel Benefits & Financial Group**

### **401(k) Services**

#### **2. Has your company added significant new capabilities that are applicable to 401(k) plans? Yes If yes, what are they?**

Sentinel Benefits & Financial Group implemented Vwise for participant enrollment and education, and SMART Messaging for members. In addition, an adviser portal was rolled out for use by third-party advisers to 401(k) plans administered by Sentinel Benefits.

## **SunTrust Bank**

### **Call-center service: How well have the centers performed?**

Our call center placed in the 1st quartile in the overall ranking of services, compared with the small corporate market, according to an independent survey conducted between July and August of 2010. Participants expressed a higher level of satisfaction across the board, including overall satisfaction with the plan, as well as satisfaction with a variety of the components of plan service, the plan Website, and service delivery through the customer-service call center.

### **401(k) Services**

#### **2. Has your company added significant new capabilities that are applicable to 401(k) plans? Yes If yes, what are they?**

The Retirement Toolbox at [www.suntrust.com/retirementsolutions](http://www.suntrust.com/retirementsolutions) provides targeted information to guide participants to save appropriately for retirement. It will soon be reflected in the Education tab in the participant demo. Participants can access planning tools segmented by four life stages: Getting Started; Making Progress; Nearing Retirement; and At Retirement.

Plan-sponsor Retirement Readiness reports assess each employee's financial health as measured against achieving an 80% preretirement readiness ratio. The reports identify specific demographic issues for consideration and offer actionable, targeted solutions.

## **Transamerica Retirement Services**

### **401(k) Services**

#### **2. Has your company added significant new capabilities that are applicable to 401(k) plans? Yes If yes, what are they?**

- Allow participants to elect to receive statements electronically (eStatements)
- Introduced new Document Center that displays documents, notices, contracts, etc., all in one location on the Website
- Introduced PayStart, an easier payroll-submission process
- 24-hour "Go Live" conversion
- Implemented conversion newsletter and microsite
- eFile 5500
- 5500 tax reporting data (Schedule C/Schedule D) on the Web for TPAs

## **USI Consulting Group**

### **401(k) Services**

**2. Has your company added significant new capabilities that are applicable to 401(k) plans? Yes**  
**If yes, what are they?**

- Webcast series for employee education
- New investment options
- Enhanced prevailing wage fringe benefit design options
- Enhanced retirement annuity income options

## **Vanguard**

### **401(k) Services**

**2. Has your company added significant new capabilities that are applicable to 401(k) plans? Yes**  
**If yes, what are they?**

#### **Regulatory Enhancements**

Working with strategic retirement consulting and ERISA legal experts, we adjusted and upgraded systems to comply with regulatory requirements as they became final. This effort is ongoing.

#### **Education initiatives**

- **Advice services:** To help ensure that participants use the most appropriate advice program(s), we added a Web-based selection tool to our Website that indicates which programs match the participant's situation, based on responses to three short questions.
- **Electronic communications delivery:** Plan sponsors can choose to send participants information using their worksite e-mail system. Participants can choose to receive communications electronically, including statements, confirmations, and notifications.
- **Consolidated plan communications area:** A dedicated page lets participants find all of the communications about the plan in one central place.

#### **Participant service enhancements**

- **Mobile technology:** Vanguard launched a mobile Website, Vanguard.mobi. This site gives Apple iPhone, Blackberry, and Open Wave 2.0-compatible device users the ability to conveniently check their total portfolio balances, review recent transactions, and stay abreast of current market conditions.

#### **Transaction processing**

Recent enhancements further automate the processing of loan repayments.

### **Regulatory Action Disclosures**

**1. Is your company involved in litigation regarding fees, fee disclosures, or revenue sharing? No**  
**Does your company intend to change its policies regarding these issues? NA**

### **Vanguard, Regulatory Action Disclosures, cont.**

As with similar institutions, The Vanguard Group and certain of its affiliates are involved in litigation from time to time. This includes litigation relating to contractual disputes, provision of investment-related services, employment disputes, and property liability matters. None of that litigation has been material to the operations or financial condition of The Vanguard Group or its affiliates.

#### **2. Has the company been investigated or are you being investigated for any issues by any outside agencies?**

The Vanguard Group and the Vanguard funds are subject to routine government and regulatory exams and requests for information. To our knowledge, neither The Vanguard Group nor any of the Vanguard funds has been the subject of an investment- or retirement plan-related regulatory investigation into allegations of misconduct.

#### **3. Has the company been involved or are you involved in any ethical investigations?**

The Vanguard Group and the Vanguard funds are subject to routine government and regulatory exams and requests for information. To our knowledge, neither The Vanguard Group nor any of the Vanguard funds has been the subject of an investment- or retirement plan-related regulatory investigation into allegations of misconduct.

## **Well Fargo**

### **Call-center service: How well have the centers performed?**

We place significant emphasis on service quality, not call quantity. We instituted a First Call Resolution standard and set it at 95%, meaning that 95% of calls with questions or concerns receive resolution during the initial call. Our Retirement Service Center Call Resolution Team, a specialized research team of the most senior members of the Retirement Service Center, is available to immediately assist retirement-service representatives with more-complex questions at the time of the call. This results in questions during the initial participant call being answered and/or resolved immediately.

We partner with the Gallup Organization to develop a participant-satisfaction survey. Gallup requests feedback from participants by telephone, contacting up to 400 participants per month, with any one participant receiving a call no more than once every six months. This survey allows us to performance-manage representatives on specific participant feedback as well as to measure the overall Retirement Service Center performance on an ongoing basis.

### **401(k) Services**

#### **2. Has your company added significant new capabilities that are applicable to 401(k) plans? Yes If yes, what are they?**

- Quicken download capability
- **Auto deferral:** Ability to place caps on increase amounts, even if the cap is below the plan maximum
- Ability to coordinate increases with a defined payroll (e.g., the first payroll of January)
- **Dollar/percent deferrals:** Allows participant elections by dollar amount in one money type and percent in another money type

### Wells Fargo, 401(k) Services, cont.

- **Mask SSN on the Internet:** Further enhances participant identity protection; sponsors choose to suppress full SSN or display only the last four digits
- Additional fields and usability changes to custom reporting
- **Enhanced 16(b) functionality:** 16(b) officers can initiate transactions via the Website, VRU, or Retirement Service Center during “closed window” periods, when transactions do not include company stock
- **In-plan guaranteed-income investment:** System enhancements support in-plan guaranteed-income investment in keeping with our open-architecture philosophy; our system is built to the new SPARK Institute standards to support portability
- **Enhanced authentication for participants:** Increased security layers allowing participants to change their own passwords online
- **Website redesign:** Improved participant Website to provide personalized content and more-intuitive navigation, including personalized messaging that illustrates whether the participant is on track for retirement, and a call to action to increase deferral amounts and/or contact a retirement service representative for a free retirement consultation
- Enhanced interactive tools and calculators that allow participants to see the impact of their retirement-planning decisions; co-branding capability, with branding by division; increased messaging characters and options, including links within the messages to other Web content
- **Enhanced auto-deferral feature:** Auto deferral increase across money types; maximum deferral increase amounts
- **Enhanced suspension reactivation process:** Proactive participant communication to reengage participants suspended from contributing
- **Enhanced participant statement:** Online statements with option for participants to opt out of paper statements
- Single sign-on for DC and NQ platforms
- **Cash fund:** Cash fund for dividend pass plans holds dividends requested for pass-through, without displaying them on the account information or the transfers and elections pages of the Website, VRU, and Retirement Service Center

#### **4. Is the company owned by, does it own, or is it an affiliate of a company(ies) that advises 401(k) plans? If yes, which one.**

The benefits-consulting division of Wells Fargo, known as BPS&M, is an employee-benefits consulting firm that provides a full range of services focusing on the design, implementation, and administration of retirement plans, health and welfare programs, nonqualified deferred-compensation plans, and benefits communications.