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DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

TAX EXEMPT AND
GOVERNMENT ENTITIES
DIVISION

MAR 07 2019

T: EP: RA: A2

Re: Substitute Mortality Table Ruling

Taxpayer =
EIN:

Plan for which substitute mortality tables are requested:

Plan IF =
EIN: (Plan No.)

Other Plans in controlled group:

Plan IO =
EIN: (Plan No.)

Plan TM =
EIN: (Plan No.)

Plan T =
EIN: (Plan No.)

Plan P =
EIN: (Plan No.)

Dear :

This letter is to inform you that your request to use substitute mortality tables for making computations under section 430 of the Internal Revenue Code (the "Code") for Plan IF has been granted with respect to the populations specified in this letter, effective for a period of 10 plan years beginning with the plan year commencing January 1,
Your request has been granted in accordance with section 430(h)(3) of the Code and section 303(h)(3) of the Employee Retirement Income Security Act of 1974.

This approval applies to the following specific populations:

- Plan IF – Male annuitants, including disabled participants
- Plan IF – Female annuitants, including disabled participants

Based on the information provided by the Taxpayer, the following populations do not have credible mortality experience, and therefore the standard mortality tables will be used for calculations under section 430 of the Code:

- Plan IF – Male nonannuitants
- Plan IF – Female nonannuitants
- Plan TM – Male nonannuitants
- Plan TM – Female nonannuitants
- Plan T – All participants
- Plan P – All participants

The Taxpayer is also separately requesting approval for substitute mortality tables for (1) all participants for Plan IO; and (2) the male annuitants and female annuitants for Plan TM. These requests will be addressed in separate ruling letters.

In granting this approval, we have only considered whether the substitute mortality rates were developed in accordance with section 1.430(h)(3)-2 of the Income Tax Regulations ("Regulations") and Revenue Procedure 2017-55. Accordingly, we are not expressing any opinion as to the accuracy or acceptability of any calculations or other material submitted with your request.

Permission is hereby granted to use the substitute mortality rates shown in the tables below for Plan IF:

Substitute Mortality Tables
Approved for use beginning with the plan year commencing January 1,
Base year

Age	Male Annuitant	Female Annuitant
1		
2		
3		
4		
5		
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7		
8		

Age	Male Annuitant	Female Annuitant
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Age	Male Annuitant	Female Annuitant
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Age	Male Annuitant	Female Annuitant
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The above rates were developed based on an experience study period from January 1, through December 31, , with a base year of The rates were calculated by adjusting the applicable standard mortality tables in section 1.430(h)(3)-1(d) of the Regulations indicated in the table below, using the mortality ratio and credibility weighting factor determined by aggregating male and female experience for Plan IF, as shown in the table below.

Population	Standard base mortality table	Mortality ratio	Credibility factor
Male Annuitants	Male Annuitant Mortality		
Female Annuitants	Female Annuitant Mortality		

The Internal Revenue Service has reviewed the substitute mortality rates and supporting information, and has determined that based on the information submitted, the rates were developed in accordance with section 1.430(h)(3)-2 of the Regulations and Revenue Procedure 2017-55.

The above rates must be applied on a generational basis, as provided in section 1.430(h)(3)-2(c)(3) of the Regulations.

Your attention is called to section 430(h)(3)(C)(ii) of the Code and section 1.430(h)(3)-2(d)(6) of the Regulations, which describe the circumstances in which the use of the substitute mortality table will terminate before the end of the 10-year period described above. In general, the substitute mortality tables can no longer be used as of the earliest of:

1. For a plan using a substitute mortality table for only one gender, the first plan year for which there is full or partial credible mortality information with respect to the other gender that had lacked credible mortality information (unless an approved substitute mortality table is used for that gender),

2. The first plan year in which the plan fails to satisfy the requirements of section 1.430(h)(3)-2(c)(1) of the Regulations, regarding the requirement that other plans and populations in the controlled group must also use substitute mortality tables unless it can be demonstrated that they do not have credible mortality information (taking into account the transition period for newly affiliated companies in section 1.430(h)(3)-2(f)(3) of the Regulations),

3. The second plan year following the plan year for which there is a significant change in individuals covered by the plan as described in section 1.430(h)(3)-2(c)(6)(iii) of the Regulations,

4. The plan year following the plan year in which a substitute mortality table used for a plan population is no longer accurately predictive of future mortality of that population, as determined by the Commissioner or as certified by the plan's actuary to the satisfaction of the Commissioner, or

5. The date specified in guidance published in the Internal Revenue Bulletin pursuant to a replacement of mortality tables specified under section 430(h)(3)(A) of the Code and section 1.430(h)(3)-1 of the Regulations, other than annual updates to the static mortality tables issued pursuant to section 1.430(h)(3)-

1(a)(3) of the regulations or changes to the mortality improvement rates pursuant to section 1.430(h)(3)-1(a)(2)(i)(C) of the Regulations.

This ruling is directed only to the taxpayer that requested it. Section 6110(k)(3) of the Code provides that it may not be used or cited by others as precedent.

When filing Form 5500 for the plan years for which the substitute mortality tables are used, please note the information that is required to be attached to Schedule SB (Actuarial Information) in accordance with the instructions to that form.

We have sent a copy of this letter to your authorized representatives pursuant to a power of attorney (Form 2848) on file in this office and to the Manager, EP Classification in Columbus, Ohio and to the Manager, EP Compliance Unit in Chicago, Illinois.

If you require further assistance in this matter, please contact
(ID#) at ( ) - .

Sincerely,

David M. Ziegler, Manager
Employee Plans Actuarial Group 2

cc: