

Paul M. Newcomer pmn@novaralaw.com

August 30, 2021

Danielle.Norris@treasury.gov

Danielle Norris, MPRA Director Department of the Treasury 1500 Pennsylvania Avenue, NW Washington, DC 20220

Re: Michigan Regional Council of Carpenters – Detroit & Vicinity

Carpenters Pension Trust Fund

Withdrawal of Second Application for Approval of Suspension of Benefits

Dear Ms. Norris:

On September 30, 2020, the Michigan regional Council of Carpenters – Detroit & Vicinity, Carpenters Pension Trust Fund (the plan), filed its *Second Application for Approval of Suspension of Benefits* under the Multiemployer Pension Reform Act of 2014 (MPRA) with Treasury. Treasury acknowledged that the filing was complete as of that date and, with the exception of a stay period agreed by the parties, we understand that the application has been under review from that time.

The enactment on March 11, 2021 of the American Rescue Plan Act of 2021 (ARP), and the publication on July 12, 2021, of PBGC's Interim Final Rule (IFR) implementing Subtitle H of ARP, has required the Trustees of the plan to consider whether availability of special financial assistance under the IFR presents a prudent alternative to the proposed suspension of benefits.

T: 248.354.0380 | F: 248.250.9927

Detroit Main Office 888 W. Big Beaver, Suite 600 | Troy, MI 48084
Detroit Satellite 2000 Town Center, Suite 1750 | Southfield, MI 48075
Toledo One SeaGate, PL10 | 555 N. Summit St., Suite 1610 | Toledo, OH 43604
Las Vegas 3960 Howard Hughes Parkway, Suite 500 | Las Vegas, NV 89169 | T: 702.990.3528
www.novaralaw.com



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By way of formal action as authorized by the plan's *Agreement and Declaration of Trust* the Trustees have determined that withdrawing the *Second Application* is in the best interest of all of the plan's participants and beneficiaries, and have authorized us to advise you of that decision. If there is any further information that you require, please let us know. On behalf of the Trustees, we thank Treasury for their attention to and assistance with this matter.

Very truly yours,

NOVARA TESIJA CATENACCI MCDONALD & BAAS, PLLC

/s/Paul M. Newcomer

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PMN/mcm