

PENSIOEN FEDERATIE

REG-121647-10

Federation of the Dutch
Pension Funds
Prinses Margrietplantsoen 90
2595 BR The Hague
PO Box 93158
2509 AD The Hague
The Netherlands
T +31 (0)70 76 20 220
info@pensioenfederatie.nl
www.pensioenfederatie.nl

APR 11 2012

LEGAL PROCESSING DIVISION
PUBLICATION & REGULATIONS
BRANCH

CC:PA:LPD:PR (NOT-121556-10)
Room 5203
Internal Revenue Service
PO Box 7604
Ben Franklin Station
Washington, DC 20044
Verenigde Staten

KvK Haaglanden 40411428
Rabobank 1054.84.318

REFERENCE: B/12/5958/TU
SUBJECT: Fatca

DATE: March 30, 2012

Dear Sir or Madam,

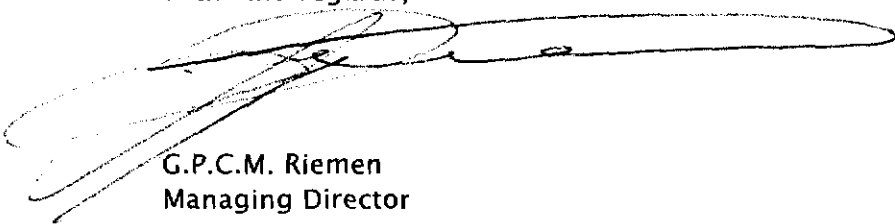
On behalf of the Dutch Pension Funds we would like to share our point of view regarding the Proposed Treasury Regulations §1.1471 – §1.1474 (FATCA).

Background. On behalf of approximately 400 pension funds, the Federation of the Dutch Pension Funds promotes the pension interests of 5.8 million participants, 2.7 million pensioners and 8.6 million early leavers. About 85% of the total number of Dutch employees is participant of a pension fund which is associated with the Federation of the Dutch Pension Funds. The Dutch pension funds together manage approximately 800 billion euro of assets.

Our point of view. We appreciate that the IRS has taken notice of our concerns regarding the supposed consequences of FATCA on the Dutch pension funds. Pension funds are by nature not suitable instruments for tax evasion. We have read the Proposed Treasury Regulations, especially the section §1.1471-6f/g/h. With the current text it is possible to attain the goals of the FATCA provisions without placing unnecessary burdens on foreign pension funds.

Our concerns are taken away by the current text of section §1.1471-6f/g/h of the Proposed Treasury Regulations. We would like to ask the IRS not to alter the text of this section. Please do not hesitate to contact us if you have any questions or we can be of further assistance. You can reach our representative Sibylle Reichert by phone on number +32 474 93 28 41 or by e-mail reichert@pensioenfederatie.eu.

With kind regards,



G.P.C.M. Riemen
Managing Director