

BAKERY AND CONFECTIONERY UNION AND INDUSTRY INTERNATIONAL PENSION FUND

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February 21, 2024

VIA E-FILING PORTAL

Pension Benefit Guaranty Corporation
1200 K Street, NW
Washington, DC 20005

Re: **Bakery and Confectionery Union and Industry International Pension
Fund Application for Special Financial Assistance**

Dear Sir or Madam:

Pursuant to Section 4262 of the Employee Retirement Income Security Act of 1974, as amended, and the regulations promulgated thereunder at 29 C.F.R. §§ 4262.1 et seq., and updates thereto, the Board of Trustees of the Bakery and Confectionery Union and Industry International Pension Fund (“the Fund”) hereby submits to the Pension Benefit Guaranty Corporation this application and accompanying exhibits for Special Financial Assistance .

If you have any questions or need additional information concerning this application, you may contact the undersigned at jbeck@bcpen.org; or Fund Co-Counsel Kathleen Keller at kkeller@bredhoff.com and Kevin Wright at klwright@littler.com.

On behalf of the Board of Trustees and the Fund’s participants, we appreciate your consideration and look forward to your response.

Sincerely yours,



John Beck
Executive Director

(1) Cover Letter and Signatures

The preceding pages provide the cover letter for the application for special financial assistance (“SFA”) with required signature from an authorized representative of the Board of Trustees.

(2) Plan Sponsor and Authorized Representatives

The following identifies the plan sponsor and authorized representatives, as well as their contact information. The Plan’s Administrator, legal counsel, and actuary named below are authorized representatives for the Plan.

Plan Sponsor Board of Trustees
Bakery and Confectionery Union and Industry International Pension Fund
10401 Connecticut Ave
Kensington, MD 20895-3960

Fund Administrator John Beck
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(3) Eligibility for SFA

The Plan is eligible for SFA because it has been certified by its actuary to be in critical and declining status for plan year beginning January 1, 2020.

(4) Priority Status

The Plan is in priority group 6, as listed on the PBGC website.

(5) Narrative Description of Contributions

The assumption for future contributions and withdrawal liability payments in this revised application is based on historical plan experience (excluding the withdrawal of one large employer during 2011 due to bankruptcy). This application also reflects a lower contraction assumption after the initial 10-year period, based on the contraction history of the employers currently in the plan as of December 31, 2022.

Contributions are projected based on future declines in CBUs of 4.6% per year for 10 years, followed by 2.3% per year thereafter. The 4.6% is based on the Plan's 10-year history of all employers excluding one large employer that withdrew due to bankruptcy. The 2.3% is based on the plan's 10-year history of contraction for employers who remain in the plan. The average contribution rate varies based on the average negotiated contribution rates of the assumed future active participants, based on current participants decrementing in accordance with the assumption for withdrawal, disability incidence, retirement and mortality, as well as future participants entering the plan, as per the new entrant profile. This result is an average contribution rate that decreases from \$4.02 to \$3.71 during the projection period through 2051.

The future withdrawal liability payments are based on current employers continuing to pay the remainder of their payment schedule. In addition, future withdrawal liability income from future withdrawals is assumed during the 10-year projection period with 4.6% contraction, which was derived by reflecting the plan's overall contraction including withdrawals during that time (excluding one large employer that withdrew in 2011 due to bankruptcy). The amount of withdrawal liability is based on the Plan's history of contributions of withdrawn employers being replaced by withdrawal liability payments, in both periodic annual payments and lump sum payments. The assumed withdrawal liability replacement is 24% of the contribution decline replaced by withdrawal liability income in annual payments for 20 years, plus 220% payable as a lump sum in the year following the decrease in contributions.

(6) a. Assumptions for SFA Eligibility

The assumptions used to determine SFA eligibility under §4262.3(a)(1) are not different from the assumptions used in the most recent actuarial certification of plan status completed before January 1, 2021.

(6) b. Changes to Assumptions for SFA Amount

The following are descriptions of the actuarial assumptions used to determine the amount of SFA that are different than those used in the most recent status certification completed before January 1, 2021, in other words, for the plan year beginning January 1, 2020 (the “2020 status certification”).

As described below, the assumptions for mortality, new entrant profile, contribution rate, “missing” terminated vested participants and withdrawal liability payments for currently withdrawn employers were changed from the 2020 status certification according to the “acceptable” changes in PBGC’s non-binding guidance on SFA assumption changes. The assumptions for administrative expenses, contribution base units (CBUs) and withdrawal liability payments for future withdrawn employers were also changed.

Interest rates were determined in accordance with §4262.4(e)(1) and (2).

All other assumptions are the same as used in the 2020 status certification.

Note, from the first revised application, the following changes have been made:

1. Death audit results of active and in-pay participants
2. CBU assumption, starting 2022 CBUs, and resulting withdrawal liability replacement for future withdrawals
3. Administrative expenses assumption

Administrative Expenses

Prior Assumption	Assumed annual expenses of \$13,000,000 for 2019 were assumed to increase by 2.5% per year until insolvency.
Reason Original Assumption is Not Reasonable	The prior assumption did not address years after the original projected insolvency in 2031 and is not reasonable for the long-term projection through the SFA projection period.
Baseline Assumption	Annual expenses of \$14,349,568 for 2023 are assumed to increase 2.5% per year, plus an adjustment for the PBGC premium increase to \$52 in 2031. Note that \$14,349,568 is equal to \$13,000,000 for 2019 with four years of 2.5% increases to 2023. The projected expenses were limited to 6% of expected benefit payments for post-certification projection years. PBGC premiums for each year are based on the projected total participant count on an open group basis.
Reason Baseline Assumption is Not Reasonable	The baseline assumption is an extension of the administrative expenses assumption as described in Paragraph A, "Adoption of assumptions not previously factored into pre-2021 certification of plan status" of Section III, Acceptable Assumption Changes of PBGC's guidance on Special Financial Assistance Assumptions. The baseline assumption is extended through December 31, 2051, the end of the SFA projection period. However, administrative expenses during 2022 were \$13,485,180. The baseline assumption for 2023 represents a 6.4% increase over 2022 actual expenses, and is therefore not reasonable for long-term ongoing expenses.
SFA Assumption	Annual expenses are assumed as follows: 2023: \$15,977,505 2024: \$14,324,051 2025: \$14,600,152 Expenses for 2026 and later are assumed to increase 2.5% per year, plus noted increases in PBGC premiums above inflation (i.e., \$52 in 2031), limited to 6% of expected benefit payments for post-certification projection years. PBGC premiums for each year are based on the projected total participant count on an open group basis.
Reason SFA Assumption is Reasonable	The updated assumption is reasonable since it takes into account actual recent experience and one-time expected expenses in 2023 and 2024. The assumed expenses for 2023 of \$15,977,505 is based on actual 2022 expenses of \$13,485,180, net of one-time expenses of \$242,181 in 2022, increased 2.5% plus an increase in 2023 expenses of \$225,000 that will be ongoing, to account for the 9.375% increase in PBGC premiums, over and above the assumed increase of 2.5%. However, for 2023, three additional one-time expenses are included: 1. The cost of the mainframe upgrade of \$1,243,322 that was paid in 2023

2. The contribution to the Pension Plan for Salaried Employees of the Bakery & Confectionery Union and Industry International Health Benefits and Pension Funds based on that Plan's funding policy increased by \$448,460 for 2023, due to investment losses incurred during 2022. Since the Pension Fund makes 75% of that contribution, an additional one time increase of \$336,345 in expenses is assumed for 2023.
3. The administrative cost incurred in preparing the initial SFA application, responding to PBGC's questions on the initial and first revised applications, the pre-application discussions and questions with the PBGC for the first revised application, and preparing the first revised application is assumed to be approximately \$598,764, and is included as a one-time expense during 2023.

For 2024, an ongoing expense of \$100,000 due to the PBGC premium increase of 5.7% over and above the 2.5% assumed inflation is included, plus one-time fees for the second revised SFA application in 2024 of \$80,000, based on actual expenses incurred to complete the second revised application.

Therefore, total expenses for 2023 are assumed to be \$15,977,505 $[(\$13,485,180 - \$242,181) \times 1.025 + \$225,000 + \$1,243,322 + \$336,345 + \$598,764]$, total expenses for 2024 are assumed to be \$14,324,051 $[((\$13,485,180 - \$242,181) \times 1.025 + \$225,000) \times 1.025 + \$100,000 + \$80,000]$, and total expenses for 2025 are assumed to be \$14,600,152 $[(((\$13,485,180 - \$242,181) \times 1.025 + \$225,000) \times 1.025) + \$100,000) \times 1.025]$.

In addition, in accordance with PBGC's assumptions guidance, a cap on expenses of 6% of benefit payments will continue to be applied.

Mortality (no change in assumption from initial or first revised application)

<p>Prior Assumption</p>	<p>The 2020 status certification used the mortality assumptions from the January 1, 2019 actuarial valuation, as follows:</p> <p><i>Non-annuitant lives:</i> RP-2006 Blue Collar Employee Mortality Table projected generationally from 2006 with Scale MP-2018</p> <p><i>Healthy annuitant lives:</i> 108% of the RP-2006 Blue Collar Healthy Annuitant Mortality Table projected generationally from 2006 with Scale MP-2018. No factor is applied to spouse or beneficiary annuitants.</p> <p><i>Disabled lives:</i> RP-2006 Disabled Retiree Mortality Table projected generationally from 2006 with Scale MP-2018</p>
<p>Reason Original Assumption is Not Reasonable</p>	<p>The prior assumption was based on tables from the Society of Actuaries' Retirement Plans Experience Committee ("RPEC") mortality study report released in October 2014, with mortality rates on a central study year of 2006. The prior assumption is no longer reasonable for purposes of determining the amount of SFA because newer tables based on more recent studies that include multiemployer pension plan mortality experience data are now available.</p>
<p>SFA Assumption</p>	<p>The mortality assumption to determine the SFA amount was updated to the following:</p> <p><i>Non-annuitant lives:</i> Pri-2012 Blue Collar Employee Mortality Table projected generationally from 2012 with Scale MP-2021</p> <p><i>Healthy annuitant lives:</i> Pri-2012 Blue Collar Healthy Annuitant Mortality Table projected generationally from 2012 with Scale MP-2021</p> <p><i>Disabled lives:</i> Pri-2012 Disabled Retiree Mortality Table projected generationally from 2012 with Scale MP-2021</p>
<p>Reason SFA Assumption is Reasonable</p>	<p>Mortality tables based on an updated RPEC study, reflecting a central study year of 2012 (the Pri-2012 tables) were published in October 2019. These blue-collar tables were constructed using a substantial amount of data from multiemployer plans.</p> <p>In addition, updated mortality improvement assumptions are published each year, the prior assumption (RPEC Scale MP-2018) was replaced with this most recently available scale (RPEC Scale MP-2021), published in October 2021.</p> <p>The updated assumption is consistent with Paragraphs B and C, "Proposed change to mortality assumption" and "Proposed change to mortality improvement projection scale" of Section III, Acceptable Assumption Changes of PBGC's guidance on Special Financial Assistance Assumptions.</p>

New Entrant Profile *(no change from initial or first revised application)*

Prior Assumption	The 2020 status certification assumed that new entrants would have similar characteristics to active participants in the census data as of December 31, 2018 who were hired over the previous five years.
Reason Original Assumption is Not Reasonable	The prior assumption is no longer reasonable for determining the amount of SFA because it only reflected the characteristics of new hires over the most recent five years who remained in service as of December 31, 2018.
SFA Assumption	<p>The new entrant profile assumption is based on the characteristics of new entrants and rehires to the plan in the five plan years preceding the plan's SFA participant census data date of January 1, 2021 (reflecting all new entrants and rehires in those five plan years rather than only those remaining in service), with five-year age bands.</p> <p>For new entrants (excluding rehires that were previously vested) in the five-year period, the average pension credits was 1.5. New entrants are assumed to enter with 1.5 pension credits and one year of vesting service.</p> <p>The new entrant profile, and experience analysis of new entrants and rehires for each of the five plan years preceding the plan's SFA participant census date is detailed in the Exhibit A.</p>
Reason SFA Assumption is Reasonable	The updated assumption is consistent with Paragraph D, "Proposed change to new entrant profile assumption" of Section III, Acceptable Assumption Changes of PBGC's guidance on Special Financial Assistance Assumptions and is therefore reasonable for determining the amount of SFA.

Contribution Rates

Prior Assumption	<p>The solvency projection in the 2020 status certification projected contributions based on the various negotiated contribution rates by each employer through 2031. It also included contribution rate increases beyond those contained in formal commitments by the collective bargaining parties that were required under the Rehabilitation Plan, (i.e., 5% contribution rate increases were assumed to continue through the year of insolvency).</p> <p>Average contribution rates were assumed to remain consistent across the projection period based on assumed consistent demographics and plan coverage by benefit level.</p>
Reason Original Assumption is Not Reasonable	<p>The prior assumption is no longer reasonable for determining the amount of SFA because it included contribution rate increases that were not in collective bargaining agreements negotiated prior to July 9, 2021 and did not address years after the original projected insolvency in 2031. Assuming a consistent average contribution rate is also not reasonable because various employers have different benefit levels and plan coverage, which vary over time.</p>
SFA Assumption	<p>Projected contributions are based on the various negotiated contribution rates by each employer that were agreed to prior to July 9, 2021. The average contribution rate varies each year based on an open group forecast of future active participants, their negotiated benefit levels and corresponding contribution rates. The average contribution rate over the projection period through 2051 is assumed to decrease from \$4.02 to \$3.71 per hour, as detailed in Template 8.</p>
Reason SFA Assumption is Reasonable	<p>The updated assumption is consistent with Paragraph E, “Proposed change to contribution rate assumption” of Section III, Acceptable Assumption Changes of PBGC’s guidance on Special Financial Assistance Assumptions. The updated assumption is extended through December 31, 2051, the end of the SFA projection period, reflecting the average contribution rate of the projected future active participants, based on an open group forecast and the new entrant profile noted above. For these reasons, the updated assumption is therefore reasonable for determining the amount of SFA.</p>

“Missing” Terminated Vested Participants *(no change from initial or first revised application)*

Prior Assumption	The 2020 status certification excluded inactive vested participants who were older than age 80 as of January 1, 2019.
Reason Original Assumption is Not Reasonable	The prior assumption was appropriate for a short-term cash flow projection for the 2020 status certification. It is no longer reasonable for determining the amount of SFA, which is based on a cash flow projection through December 31, 2051.
SFA Assumption	Inactive vested participants who are age 85 and younger (and were previously excluded from the January 1, 2021 valuation) as of the SFA measurement date and not found to be deceased as of the measurement date are included. The payments are assumed to begin immediately. Consistent with Plan procedures, an actuarial increase from Normal Retirement Age (NRA) to the participant’s required beginning date (RBD) was included and a lump sum of payments from the RBD to the SFA measurement date is assumed to be payable on the day following the SFA measurement date.
Reason SFA Assumption is Reasonable	The updated assumption is consistent with Paragraph F, “Proposed change for “missing” terminated vested participants” of Section III, Acceptable Assumption Changes of PBGC’s guidance on Special Financial Assistance Assumptions. The updated assumption reflects the efforts of the Fund Office to locate these participants per the Plan procedures as noted in the plan document, section 8.27. Given these efforts, we expect that those not confirmed to be deceased who are age 85 and younger as of the measurement date will eventually be paid the retirement benefits that are due to them. The updated assumption is also consistent with Plan procedures for participants commencing benefits after their required beginning date. For these reasons, the updated assumption is therefore reasonable for determining the amount of SFA.

Contribution Base Units (CBUs)

Prior Assumption	The 2020 status certification assumed that 17,186 active participants as of January 1, 2019 would decline by 4% per year until insolvency. The average CBUs per active participant was assumed to be 2,000 hours for all years until insolvency. Expressed in terms of total hours, the assumption was that 34,372,000 hours in 2019 would decline by 4% per year until insolvency.
Reason Prior Assumption is Not Reasonable	<p>The prior assumption did not address years after the original projected insolvency in 2031 and is not reasonable for the long-term projection through the SFA projection period.</p> <p>In addition, the decline of 4% per year, as compared to the actual plan history over a 10-year period would not materially change the projected insolvency date reported in the 2020 status certification. A projection through 2051 would require a more refined projection based on historical plan experience.</p>
Baseline Assumption	Active participants as of January 1, 2019 are assumed to decline by 4% per year through the year ended December 31, 2030 (the last full plan year prior to the projected year of insolvency in the 2020 status certification). From 2031 to 2051, the active population is then assumed to remain at the same level as in 2030. The average CBUs per active participant was assumed to be 2,000 hours for all years through the year ended December 31, 2051. Expressed in terms of total hours, the assumption is that 34,372,000 hours in 2019 will decline by 4% per year through the year ended December 31, 2030 and then remain at the same level as in 2030 from 2031 to 2051.
Reason Baseline Assumption is Not Reasonable	The assumption in the Baseline projection is not reasonable because it does not reflect the historical decline in CBUs experienced in the 10 full plan years (2010 through 2019) excluding the “COVID period” defined in Section IV, Generally Acceptable Assumption Changes of PBGC’s guidance on Special Financial Assistance Assumptions.
SFA Assumption	The actual total number of hours for the year ended December 31, 2022 was 33,615,309 (note this was updated slightly from the first revised application due to late reported hours). The 2022 hours are assumed to decline by 4.6% per year for 10 years followed by 2.3% per year through the year ended December 31, 2051. The average CBUs per active participant was assumed to be 2,000 hours for all years through the year ended December 31, 2051. Active participant counts in a plan year are assumed to equal the assumed total number of hours for that year divided by 2,000 hours.
Reason SFA Assumption is Reasonable	The SFA assumption is reasonable for determining the amount of SFA because it extends through December 31, 2051, the end of the SFA projection period. It is also reasonable for this purpose because it reflects the historical decline in CBUs experienced in the 10 full plan years (2010 through 2019) excluding the “COVID period” defined in

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Paragraph A of Section IV, Generally Acceptable Assumption Changes of PBGC's guidance on Special Financial Assistance Assumptions. The rate of contraction for the first 10 years of the projection period is based on the rate of contraction from the recent 10-year history for all employers, excluding one large employer that withdrew in 2011 due to bankruptcy. The rate of contraction after the initial 10-year period is based on the historical contraction of employers currently in the plan, over the 10-year period 2010 – 2019, excluding the COVID period. The details of the 10-year history is provided in Exhibit B.

Withdrawal Liability Payments for Currently Withdrawn Employers (*no change from first revised application*)

Prior Assumption	The 2020 status certification assumed that withdrawn employers deemed to have collectible withdrawal liability at that time would make all remaining withdrawal liability payments required for the duration of their payment schedules. The total amounts for each year were then rounded to the nearest \$100,000. The table in the 2020 status certification shows the 2020 status certification assumption for the years 2023 through 2031.
Reason Prior Assumption is Not Reasonable	The prior assumption did not address years after the original projected insolvency in 2031 and is not reasonable for the long-term projection through the SFA projection period. The prior assumption was also based on withdrawals as of that date and did not reflect any settlements or new withdrawals since that time.
SFA Assumption	Withdrawn employers deemed to have collectible withdrawal liability as of the SFA measurement date are assumed to make all remaining withdrawal liability payments required for the duration of their payment schedules. Since the initial application, one employer stopped paying its withdrawal liability installment payments in August 2022, and has indicated that it is fully insolvent with no future assets to make additional payments. Therefore, no further withdrawal liability payments are assumed to be made from this employer. Template 8 shows the details of the future expected withdrawal liability income for currently withdrawn employers.
Reason SFA Assumption is Reasonable	<p>The updated assumption is reasonable for determining the amount of SFA because it extends through December 31, 2051, the end of the SFA projection period. It is also reasonable for this purpose because it reflects any withdrawals, settlements and defaults that occurred up to the SFA measurement date.</p> <p>The updated assumption is included in the Baseline projection as it is deemed similar in nature to the CBU assumption extension and the contribution rate assumption described in Paragraphs A and E of Section III, Acceptable Assumption Changes of PBGC’s guidance on Special Financial Assistance Assumptions.</p>

Withdrawal Liability Payments for Future Withdrawn Employers

Prior Assumption	The 2020 status certification assumed no withdrawal liability payments for future withdrawn employers.
Reason Prior Assumption is Not Reasonable	Given the assumption of 4.6% CBU contraction for the first 10 years of the projection period, which was based on historical contraction of the 10-year period (2010 – 2019), it is unreasonable to not also look at historical withdrawal liability income due to the decline in CBUs. Having no withdrawal liability income attributable to future withdrawals is unreasonable.
SFA Assumption	The decrease in contributions during the 10 years in which contraction is assumed to be 4.6% is replaced with withdrawal liability payments in the year following the decrease: 24% of the contribution decline for each of the first 10 years is replaced with annual withdrawal liability payments payable for 20 years and 220% of the contribution decline is replaced with a one-time lump sum withdrawal liability payment.
Reason SFA Assumption is Reasonable	<p>An assumption for future withdrawal liability income is reasonable for this revised application.</p> <p>The replacement assumptions were based on historical plan experience as follows:</p> <p>Based on this Plan’s history excluding one large employer withdrawal in 2011 as indicated in Exhibit B, 2.3% of the 4.6% contraction is due to withdrawals (4.6% - 2.3%). Therefore 50% of contribution declines can be considered due to withdrawals (2.3%/4.6%). Future withdrawals are assumed during the 10-year period of 4.6% contraction. No future withdrawals are assumed after the initial 10-year period, since the 2.3% contraction assumption during this period was derived based on the historical declines of current employers in the plan, which does not reflect any withdrawals.</p> <p>The historical withdrawal liability replacement rates (excluding the withdrawal of one large employer due to bankruptcy) indicate approximately 47% of the contribution declines due to withdrawn employers is replaced with periodic withdrawal liability payments and 39% of contribution declines due to withdrawn employers is replaced by annual withdrawal liability payments from employers that paid in a lump sum.</p> <p>Periodic Payments: 24% (50% contribution declines due to withdrawals x 47% replacement) of the contribution decline is replaced with annual withdrawal liability payments for 20 years.</p> <p>Lump Sum Payments: 220% of the contribution decline is replaced in a one-time lump sum withdrawal liability payment. The 220% was derived from 50% of contribution declines due to withdrawals, of which 39% of replacement withdrawal liability is paid in a lump sum, with a lump sum present value factor of 11.73, and a 4% reduction</p>

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due to the settlements being less than 100% of the policy amount.
[220% = 50% x 39% x 11.73 x 96%]

The Fund's lump sum payment policy allows employers to pay their withdrawal liability in a lump sum using a present value based on an interest rate equal to the 20-year PBGC interest rate plus 2%, but not higher than the plan's funding interest rate, which is 6.5%. The most current 20-year PBGC interest rate published (for January 2024 – March 2024) is 5.45%. A 20-year present value factor at 6.5% is 11.73. The historical collectability of lump sum withdrawal liability indicates that the Fund's historical experience of lump sum settlements have been slightly less (4%) than 100% of the policy amount.

Exhibit A

New Entrant Profile

(no change from the initial or first revised application)

The following new entrant profile is based on the characteristics of new entrants and rehires to the plan in the five plan years preceding the plan’s SFA participant census data date of January 1, 2021 (reflecting all new entrants and rehires in those five plan years rather than only those remaining in service), with five-year age bands, excluding new entrants from a large employer that withdrew in 2018.

For new entrants (excluding rehires that were previously vested) in the five-year period, the average pension credits was 1.5. New entrants are assumed to enter with 1.5 pension credits and one year of vesting service.

The new entrants were assigned a profile based on age bands, gender, plan coverage, average Pension Benefit Level (PBL), and average hourly contribution rate as follows. The net result is more than 300 distinct categories of new entrants. For example, 0.9% of the new entrants are male between age 20 and 24, with Plan A coverage with a \$694 PBL, \$1.77 contribution rate, and entering with 1.5 pension credits (13% x 62% x 11.4%).

Age Bands:

Age Band	Percent of New Entrants in Age Band
20-24	13%
25-29	18%
30-34	14%
35-39	12%
40-44	11%
45-49	10%
50-54	9%
55-59	8%
60-64	5%

Gender:

Gender	Percent of New Entrants by Gender
Males	62%
Females	38%

Plan Coverage: Employers have the choice of plan coverage and benefit level with different contribution rates. Employers were subject to Rehabilitation Plan contribution rate increases of 5% per year under the preferred schedule through 2020, based on when the employer negotiated the schedule, resulting in different contribution rates for the same plan coverage.

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Plan Coverage	Average Pension Benefit Level (PBL)	Average Hourly Contribution Rate	Percent of New Entrants by Plan Coverage
Plan A	\$694	\$1.77	11.4%
Plan C	785	1.83	10.5%
Plan CC	1,500	3.87	0.4%
Plan CC and D1	1,425	4.01	0.1%
Plan CC and D2	1,188	3.26	Less than 0.1%
Plan CC and D4	1,394	4.33	0.5%
Plan C and D1	1,100	4.14	0.2%
Plan C and D2	1,402	4.27	0.5%
Plan C and D3	1,244	4.26	0.5%
Plan C and D4	1,121	3.42	0.6%
Plan G	1,225	3.57	51.9%
Plan G and D1	1,681	5.34	0.4%
Plan G and D2	1,473	4.91	4.2%
Plan G and D3	1,534	5.52	7.7%
Plan G and D4	1,812	7.02	9.4%
Plan A and D1	869	3.46	0.1%
Plan A and D4	790	2.85	1.6%

Exhibit A

New Entrant Plan Experience

(excludes new entrants from a large employer that withdrew in 2018)

Age Bands (excludes unknowns):

Plan Year Ending December 31:

Age Band	2016		2017		2018		2019		2020		Total	
	Count	%										
20-24	281	13%	246	14%	294	15%	213	12%	201	13%	1235	13%
25-29	380	18%	343	19%	331	17%	348	19%	249	16%	1651	18%
30-34	286	14%	269	15%	299	15%	244	13%	228	15%	1326	14%
35-39	242	11%	213	12%	251	13%	242	13%	190	12%	1138	12%
40-44	181	9%	197	11%	219	11%	196	11%	190	12%	983	11%
45-49	231	11%	191	11%	197	10%	175	10%	146	9%	940	10%
50-54	223	11%	154	8%	166	8%	161	9%	136	9%	840	9%
55-59	192	9%	132	7%	148	7%	141	8%	111	7%	724	8%
60-64	98	5%	70	4%	92	5%	99	5%	88	6%	447	5%

Gender (excludes unknowns):

Plan Year Ending December 31:

Gender	2016		2017		2018		2019		2020		Total	
	Count	%										
Male	739	66%	1,234	65%	1,184	63%	1,085	59%	872	58%	5,114	62%
Female	376	34%	653	35%	709	37%	769	41%	631	42%	3,138	38%

Pension Credit for new entrants not from inactive vested status:

Plan Year Ending December 31:

	2016	2017	2018	2019	2020	Total
Count	2,020	1,922	1,911	1,742	1,594	9,189
Average Pension Credit	1.54	1.47	1.50	1.53	1.45	1.50

Exhibit B

Historical CBU Experience

Year	Total CBU's*	% Change from Prior year	CBU's Current Employers	% Change from Prior year
2010	54,369,219		42,208,978	
2011	53,570,828	-1.5%	41,652,965	-1.3%
2012	50,958,887	-4.9%	39,622,377	-4.9%
2013	49,993,487	-1.9%	38,928,430	-1.8%
2014	49,001,973	-2.0%	38,151,280	-2.0%
2015	48,276,947	-1.5%	36,877,646	-3.3%
2016	45,143,268	-6.5%	36,454,686	-1.1%
2017	44,067,835	-2.4%	36,056,887	-1.1%
2018	40,056,522	-9.1%	35,536,072	-1.4%
2019	35,462,053	-11.5%	34,320,068	-3.4%
2020				
2021				
2022	33,615,309		33,608,717	
10-year change 2010 - 2019 (excluding COVID years)		-4.6%		-2.3%

* Excludes the CBUs of one large employer that withdrew in 2011 and paid no withdrawal liability due to bankruptcy.

(7) Reinstatement of Suspended Benefits

As of the date of the SFA application, the Plan has not suspended benefits under section 305(e)(9) or section 4245(a) of ERISA and does not intend to do so. Therefore, the Plan does not anticipate having to reinstate suspended benefits.

Bakery and Confectionery Union and Industry International Pension Fund
Application for Special Financial Assistance | Section E(5): SFA Amount Certification
EIN 52-6118572

February 21, 2024

This is to certify that the requested amount of Special Financial Assistance (“SFA”) of \$3,199,389,088 is the amount to which the Bakery and Confectionery Union and Industry International Pension Fund (“Fund”) is entitled under section 4262(j)(1) of ERISA and §4262.4 of PBGC’s SFA regulation. The amount of SFA for the Fund was calculated as of the SFA measurement date of December 31, 2022 in accordance with generally accepted actuarial principles and practices and the provisions under §4262.4(e) of PBGC’s SFA regulation.

Segal has determined the amount of SFA at the request of the Board of Trustees as part of the Fund’s application for SFA. The calculation of the amount of SFA shown in the Fund’s application for SFA is not applicable for other purposes.

The calculation of the amount of SFA is based on the assumptions and methods used in the 2020 certification of actuarial plan status, dated March 30, 2020, modified as described in Section D, Item 6b of the *“General Instructions for Multiemployer Plans Applying for Special Financial Assistance.”* It is based on the participant data for the January 1, 2021 actuarial valuation of the Fund. This data was supplied by the Fund Administrator and the census data date is December 31, 2020. As described in Section B, Item 9 of the *“General Instructions for Multiemployer Plans Applying for Special Financial Assistance,”* deaths that occurred before the census date have been reflected for SFA purposes. This includes the results of the independent death audit facilitated by the PBGC.

The calculation of the SFA amount is also based on the fair market value of assets as of the SFA measurement date certified by the plan sponsor, and other relevant information provided by the Fund Administrator. Segal does not audit the data provided. The accuracy and comprehensiveness of the data is the responsibility of those supplying the data. To the extent we can, however, Segal does review the data for reasonableness and consistency. Based on our review of the data, we have no reason to doubt the substantial accuracy of the information on which we have based the calculation of the SFA amount and we have no reason to believe there are facts or circumstances that would affect the validity of these results.

Segal does not practice law and, therefore, cannot and does not provide legal advice. Any statutory interpretation on which these calculations are based reflects Segal’s understanding as an actuarial firm.

I am a member of the American Academy of Actuaries and I meet the Qualification Standards of the American Academy of Actuaries to render the actuarial opinion herein.

Bakery and Confectionery Union and Industry International Pension Fund
Application for Special Financial Assistance | Section E(5): SFA Amount Certification
EIN 52-6118572

To the best of my knowledge, the information supplied herein is complete and accurate. Each prescribed assumption for the determination of the amount of SFA was applied in accordance with applicable law and regulations. In my opinion, all other assumptions are reasonable taking into account the experience of the plan and reasonable expectations.

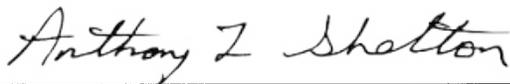
Susan L Boyle

Susan Boyle, FSA, FCA, MAAA, EA
Senior Vice President & Actuary
Enrolled Actuary No. 23-06862

BAKERY AND CONFECTIONERY UNION AND INDUSTRY INTERNATIONAL PENSION FUND

10401 Connecticut Avenue • Kensington, Maryland 20895-3960
(301) 468-3742 <http://www.bctrustfunds.org> Fax (301) 468-3748

Under penalty of perjury under the laws of the United States of America, we declare that we are authorized trustees who are current members of the Board of Trustees of the Bakery and Confectionery Union and Industry International Pension Fund and that we have examined this application, including accompanying documents, and, to the best of our knowledge and belief, the application contains all the relevant facts relating to the application; all statements of fact contained in the application are true, correct and not misleading because of omission of any material fact; and all accompanying documents are what they purport to be.



Anthony Shelton
Chairman, Board of Trustees
Bakery and Confectionery Union & Industry
International Pension Fund

Date: February 21, 2024



Lou Minella
Secretary, Board of Trustees
Bakery and Confectionery Union & Industry
International Pension Fund

Date: February 21, 2024

Application Checklist

v20230727

Instructions for Section E, Item 1 of the Instructions for Filing Requirements for Multiemployer Plans Applying for Special Financial Assistance (SFA):

The Application to PBGC for Approval of Special Financial Assistance Checklist ("Application Checklist" or "Checklist") identifies all information required to be filed with an initial or revised application. For a supplemented application, instead use "Application Checklist - Supplemented." The Application Checklist is not required for a lock-in application.

For a plan required to submit additional information described in Addendum A of the SFA Filing Instructions, also complete Checklist Items #40.a. to #49.b., and if there is a merger as described in Addendum A, also complete Checklist Items #50 through #63.

Applications (including this Application Checklist), with the exception of lock-in applications, must be submitted to PBGC electronically through PBGC's e-Filing Portal, (<https://efilingportal.pbgc.gov/site/>). After logging into the e-Filing Portal, go to the Multiemployer Events section and click "Create New ME Filing." Under "Select a filing type," select "Application for Financial Assistance – Special." Note: revised and supplemented applications must be submitted by selecting "Create New ME Filing."

Note: If you go to the e-Filing Portal and do not see "Application for Financial Assistance – Special" under the "Select a Filing Type," then the e-Filing Portal is temporarily closed and PBGC is not accepting applications (other than lock-in applications) at the time, unless the plan is eligible to make an emergency filing under § 4262.10(f). PBGC's website, www.pbgc.gov, will be updated when the e-Filing Portal reopens for applications. PBGC maintains information on its website at www.pbgc.gov to inform prospective applicants about the current status of the e-Filing portal, as well as to provide advance notice of when PBGC expects to open or temporarily close the e-Filing Portal.

General instructions for completing the Application Checklist:

Complete all items that are shaded: 

If required information was already filed: (1) through PBGC's e-Filing Portal; or (2) through any means for an insolvent plan, a plan that has received a partition, or a plan that submitted an emergency filing, the filer may either upload the information with the application or include a statement in the Plan Comments section of the Application Checklist indicating the date on which and the submission with which the information was previously filed. For any such items previously provided, enter N/A as the **Plan Response**.

For a revised application, the filer may, but is not required to, submit an entire application. For all Application Checklist Items that were previously filed that are not being changed, the filer may include a statement in the Plan Comments section of the Application Checklist to indicate that the other information was previously provided as part of the initial application. For each, enter N/A as the **Plan Response**.

Instructions for specific columns:

Plan Response: Provide a response to each item on the Application Checklist, using only the **Response Options** shown for each Checklist Item.

Name(s) of Files Uploaded: Identify the full name of the file or files uploaded that are responsive to the Checklist Item. The column **Upload as Document Type** provides guidance on the "document type" to select when submitting documents on PBGC's e-Filing Portal.

Page Number Reference(s): For Checklist Items #22 to #29c, submit all information in a single document and identify here the relevant page numbers for each such Checklist Item.

Plan Comments: Use this column to provide explanations for any **Plan Response** that is N/A, to respond as may be specifically identified for Checklist Items, and to provide any optional explanatory comments.

Additional guidance is provided in the following columns:

Upload as Document Type: When uploading documents in PBGC's e-Filing Portal, select the appropriate Document Type for each document that is uploaded. This column provides guidance on the Document Type to select for each Checklist Item. You may upload more than one document using the same Document Type, and there may be Document Types on the e-Filing Portal for which you have no documents to upload.

Required Filenaming (if applicable): For certain Checklist Items, a specified format for naming the file is required.

SFA Instructions Reference: Identifies the applicable section and item number in PBGC's Instructions for Filing Requirements for Multiemployer Plans Applying for Special Financial Assistance.

You must select N/A if a Checklist Item # is not applicable to your application. **Your application will be considered incomplete if No is entered as a Plan Response for any of Checklist Items #1 through #39 on the Application Checklist. If there has been an event as described in § 4262.4(f), complete Checklist Items #40.a. through #49.b., and if there has been a merger described in Addendum A, also complete Checklist Items #50 through #63. Your application will be considered incomplete if No is entered as a Plan Response for any of Checklist Items #40.a. through #49.b. if you are required to complete Checklist Items # 40.a. through #49.b. Your application will also be considered incomplete if No is entered as a Plan Response for any of Checklist Items #50 through #63 if you are required to complete Checklist Items #50 through #63.**

If a Checklist Item # asks multiple questions or requests multiple items, the Plan Response should only be Yes if the plan is providing all information requested for that Checklist Item.

Note, a Yes or No response is also required for Checklist Items #a through #f.

Note, in the case of a plan applying for priority consideration, the plan's application must also be submitted to the Treasury Department. If that requirement applies to an application, PBGC will transmit the application to the Treasury Department on behalf of the plan. See IRS Notice [NOTICE] for further information.

All information and documentation, unless covered by the Privacy Act, that is included in an SFA application may be posted on PBGC's website at www.pbgc.gov or otherwise publicly disclosed, without additional notification. Except to the extent required by the Privacy Act, PBGC provides no assurance of confidentiality in any information included in an SFA application.

Version Updates (newest version at top)

Version	Date updated
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v07272023p	07/27/2023	Updated checklist to include new Template 10 requirement and reflect changes to eligibility and death audit instructions
v20221129p	11/29/2022	Updated checklist item 11. for new death audit requirements
v20220802p	08/02/2022	Fixed some of the shading in the checklist
v20220706p	07/06/2022	

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

APPLICATION CHECKLIST

Plan name:	Bakery and Confectionery Union and Industry International Pension Fund
EIN:	52-6118572
PN:	001
SFA Amount Requested:	\$3,199,389,088.00

Do NOT use this Application Checklist for a supplemented application. Instead use Application Checklist - Supplemented.

-----Filers provide responses here for each Checklist Item:-----

Unless otherwise specified:
 YYYY = plan year
 Plan Name = abbreviated plan name

Your application will be considered incomplete if No is entered as a Plan Response for any of Checklist Items #1 through #39. In addition, if required to provide information due to a "certain event" (see Addendum A of the SFA Filing Instructions), your application will be considered incomplete if No is entered as a Plan Response for any Checklist Items #40.a. through #49.b. If there is a merger event described in Addendum A, your application will also be considered incomplete if No is entered as a Plan Response for any Checklist Items #50 through #63.

Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
Plan Information, Checklist, and Certifications									
a.		Is this application a revised application submitted after the denial of a previously filed application for SFA?	Yes No	No	N/A	N/A		N/A	N/A
b.		Is this application a revised application submitted after a plan has withdrawn its application for SFA that was initially submitted under the interim final rule?	Yes No	No	N/A	N/A		N/A	N/A
c.		Is this application a revised application submitted after a plan has withdrawn its application for SFA that was submitted under the final rule?	Yes No	Yes	N/A	N/A		N/A	N/A
d.		Did the plan previously file a lock-in application?	Yes No	No	N/A	N/A	If a "lock-in" application was filed, provide the filing date.	N/A	N/A
e.		Has this plan been terminated?	Yes No	No	N/A	N/A	If terminated, provide date of plan termination.	N/A	N/A
f.		Is this plan a MPRA plan as defined under § 4262.4(a)(3) of PBGC's SFA regulation?	Yes No	No	N/A	N/A		N/A	N/A
1.	Section B, Item (1)a.	Does the application include the most recent plan document or restatement of the plan document and all amendments adopted since the last restatement (if any)?	Yes No	Yes		N/A	Previously provided under initial application. <i>PlanDoc BCPEN.pdf</i> , <i>PlanDocAmends BCPEN.pdf</i>	Pension plan documents, all versions available, and all amendments signed and dated	N/A
2.	Section B, Item (1)b.	Does the application include the most recent trust agreement or restatement of the trust agreement, and all amendments adopted since the last restatement (if any)?	Yes No	Yes		N/A	Previously provided under initial application. <i>Trust BCPEN.pdf</i>	Pension plan documents, all versions available, and all amendments signed and dated	N/A
3.	Section B, Item (1)c.	Does the application include the most recent IRS determination letter? Enter N/A if the plan does not have a determination letter.	Yes No N/A	Yes		N/A	Previously provided under initial application. <i>Determination BCPEN.pdf</i>	Pension plan documents, all versions available, and all amendments signed and dated	N/A
4.	Section B, Item (2)	Does the application include the actuarial valuation report for the 2018 plan year and each subsequent actuarial valuation report completed before the filing date of the initial application? Enter N/A if no actuarial valuation report was prepared because it was not required for any requested year. Is each report provided as a separate document using the required filename convention?	Yes No N/A	Yes		N/A	4 actuarial valuations were previously provided under initial application. <i>2018AVR BCPEN.pdf</i> , <i>2019AVR BCPEN.pdf</i> , <i>2020AVR BCPEN.pdf</i> , <i>2021AVR BCPEN.pdf</i>	Most recent actuarial valuation for the plan	YYYYAVR Plan Name
5.a.		Does the application include the most recent rehabilitation plan (or funding improvement plan, if applicable), including all subsequent amendments and updates, and the percentage of total contributions received under each schedule of the rehabilitation plan or funding improvement plan for the most recent plan year available?	Yes No	Yes		N/A	Previously provided under initial application. <i>RehabPlan BCPEN.pdf</i>	Rehabilitation plan (or funding improvement plan, if applicable)	N/A

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

APPLICATION CHECKLIST

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EIN:	52-6118572
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Your application will be considered incomplete if No is entered as a Plan Response for any of Checklist Items #1 through #39. In addition, if required to provide information due to a "certain event" (see Addendum A of the SFA Filing Instructions), your application will be considered incomplete if No is entered as a Plan Response for any Checklist Items #40.a. through #49.b. If there is a merger event described in Addendum A, your application will also be considered incomplete if No is entered as a Plan Response for any Checklist Items #50 through #63.

Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
5.b.	Section B, Item (3)	If the most recent rehabilitation plan does not include historical documentation of rehabilitation plan changes (if any) that occurred in calendar year 2020 and later, does the application include an additional document with these details? Enter N/A if the historical document is contained in the rehabilitation plans.	Yes No N/A	Yes		N/A	Previously provided under initial application. <i>RehabPlan BCPEN.pdf</i>	Rehabilitation plan (or funding improvement plan, if applicable)	N/A
6.	Section B, Item (4)	Does the application include the plan's most recently filed (as of the filing date of the initial application) Form 5500 (Annual Return/Report of Employee Benefit Plan) and all schedules and attachments (including the audited financial statement)? Is the 5500 filing provided as a single document using the required filename convention?	Yes No	Yes		N/A	Previously provided under initial application. <i>2021Form5500 BCPEN.pdf</i>	Latest annual return/report of employee benefit plan (Form 5500)	YYYYForm5500 Plan Name
7.a.		Does the application include the plan actuary's certification of plan status ("zone certification") for the 2018 plan year and each subsequent annual certification completed before the filing date of the initial application? Enter N/A if the plan does not have to provide certifications for any requested plan year. Is each zone certification (including the additional information identified in Checklist Items #7.b. and #7.c. below, if applicable) provided as a single document, separately for each plan year, using the required filename convention?	Yes No N/A	Yes		N/A	5 zone certifications were previously provided under initial application. <i>2018Zone20180329 BCPEN.pdf, 2019Zone20190331 BCPEN.pdf, 2020Zone20200330 BCPEN.pdf, 2021Zone20210331 BCPEN.pdf, 2022Zone20220331 BCPEN.pdf</i>	Zone certification	YYYYZoneYYYYMMDD Plan Name, where the first "YYYY" is the applicable plan year, and "YYYYMMDD" is the date the certification was prepared.
7.b.	Section B, Item (5)	Does the application include documentation for all zone certifications that clearly identifies all assumptions used including the interest rate used for funding standard account purposes? If such information is provided in an addendum, addendums are only required for the most recent actuarial certification of plan status completed before January 1, 2021 and each subsequent annual certification. Is this information included in the single document in Checklist Item #7.a. for the applicable plan year?	Yes No N/A	Yes	N/A - include as part of documents in Checklist Item #7.a.	N/A		N/A - include as part of documents in Checklist Item #7.a.	N/A - included in a single document for each plan year - See Checklist Item #7.a.
7.c.		For a certification of critical and declining status, does the application include the required plan-year-by-plan-year projection (showing the items identified in Section B, Item (5)a. through (5)f. of the SFA Instructions) demonstrating the plan year that the plan is projected to become insolvent? If required, is this information included in the single document in Checklist Item #7.a. for the applicable plan year? Enter N/A if the plan entered N/A for Checklist Item #7.a. or if the application does not include a certification of critical and declining status.	Yes No N/A	Yes	N/A - include as part of documents in Checklist Item #7.a.	N/A		N/A - include as part of documents in Checklist Item #7.a.	N/A - included in a single document for each plan year - See Checklist Item #7.a.

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

APPLICATION CHECKLIST

Plan name:	Bakery and Confectionery Union and Industry International Pension Fund
EIN:	52-6118572
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SFA Amount Requested:	\$3,199,389,088.00

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
8.	Section B, Item (6)	Does the application include the most recent account statements for each of the plan's cash and investment accounts? Insolvent plans may enter N/A, and identify in the Plan Comments that this information was previously submitted to PBGC and the date submitted.	Yes No N/A	Yes		N/A	Previously provided under first revised application. <i>Rev AccountStatements BCPEN.pdf</i>	Bank/Asset statements for all cash and investment accounts	N/A
9.	Section B, Item (7)	Does the application include the most recent plan financial statement (audited, or unaudited if audited is not available)? Insolvent plans may enter N/A, and identify in the Plan Comments that this information was previously submitted to PBGC and the date submitted.	Yes No N/A	Yes		N/A	Previously provided under first revised application. <i>Rev AuditedFinStmntDec2022 BCPEN.pdf</i>	Plan's most recent financial statement (audited, or unaudited if audited not available)	N/A
10.	Section B, Item (8)	Does the application include all of the plan's written policies and procedures governing the plan's determination, assessment, collection, settlement, and payment of withdrawal liability? Are all such items included as a single document using the required filenaming convention?	Yes No N/A	Yes		N/A	Previously provided under initial application. <i>WDL BCPEN.pdf</i>	Pension plan documents, all versions available, and all amendments signed and dated	<i>WDL Plan Name</i>
11.a.	Section B, Item (9a).	Does the application include documentation of a death audit to identify deceased participants that was completed on the census data used for SFA purposes, including identification of the service provider conducting the audit, date performed, the participant counts (provided separately for current retirees and beneficiaries, current terminated vested participants not yet in pay status, and current active participants) run through the death audit, and a copy of the results of the audit provided to the plan administrator by the service provider? If applicable, has personally identifiable information in this report been redacted prior to submission to PBGC? Is this information included as a single document using the required filenaming convention?	Yes No	Yes	<i>Rev2 Death Audit BCPEN.pdf</i>	N/A	Initial application includes Fund Office death audit procedures and results labeled <i>Death Audit BCPEN.pdf</i> . The first revised application includes results of independent death audit for inactive vested participants labeled <i>Rev Death Audit BCPEN.pdf</i> . This second revised application includes a reconciliation of the flow of lives from the 2021 valuation report to the SFA filing, reflecting all known deaths.	Pension plan documents, all versions available, and all amendments signed and dated	<i>Death Audit Plan Name</i>
11.b.		If any known deaths occurred before the date of the census data used for SFA purposes, is a statement certifying these deaths were reflected for SFA calculation purposes provided?	Yes No N/A	Yes	N/A - include as part of documents in Checklist Item #11.a.	N/A	This is included in the actuary's certification as required by Section E Item 5.	N/A	N/A - include as part of documents in Checklist Item #11.a.

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

APPLICATION CHECKLIST

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EIN:	52-6118572
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Unless otherwise specified:
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Your application will be considered incomplete if No is entered as a Plan Response for any of Checklist Items #1 through #39. In addition, if required to provide information due to a "certain event" (see Addendum A of the SFA Filing Instructions), your application will be considered incomplete if No is entered as a Plan Response for any Checklist Items #40.a. through #49.b. If there is a merger event described in Addendum A, your application will also be considered incomplete if No is entered as a Plan Response for any Checklist Items #50 through #63.

Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
11.c.	Section B, Item (9)b.	Does the application include full census data (Social Security Number and name) of all terminated vested participants that were included in the SFA projections? Is this information provided in Excel, or in an Excel-compatible format?	Yes No N/A	Yes		N/A	Previously provided during PBGC review of initial application.	Submit the data file and the date of the census data through PBGC's secure file transfer system, Leapfile. Go to http://pbgc.leapfile.com , click on "Secure Upload" and then enter sfa@pbgc.gov as the recipient email address and upload the file(s) for secure transmission	Include as the subject "Submission of Terminated Vested Census Data for (Plan Name)," and as the memo "(Plan Name) terminated vested census data dated (date of census data) through Leapfile for independent audit by PBGC."
12.	Section B, Item (10)	Does the application include information required to enable the plan to receive electronic transfer of funds if the SFA application is approved, including (if applicable) a notarized payment form? See SFA Instructions, Section B, Item (10).	Yes No	Yes		N/A	Previously provided under initial application. <i>ElectronicPayment BCPEN.pdf</i>	Other	N/A
13.	Section C, Item (1)	Does the application include the plan's projection of expected benefit payments that should have been attached to the Form 5500 Schedule MB in response to line 8b(1) on the Form 5500 Schedule MB for plan years 2018 through the last year the Form 5500 was filed by the filing date of the initial application? Enter N/A if the plan is not required to respond Yes to line 8b(1) on the Form 5500 Schedule MB. See Template 1. Does the uploaded file use the required filenaming convention?	Yes No N/A	Yes		N/A	Previously provided under initial application. <i>Template 1 BCPEN.xlsx</i>	Financial assistance spreadsheet (template)	Template 1 Plan Name
14.	Section C, Item (2)	If the plan was required to enter 10,000 or more participants on line 6f of the most recently filed Form 5500 (by the filing date of the initial application), does the application include a current listing of the 15 largest contributing employers (the employers with the largest contribution amounts) and the amount of contributions paid by each employer during the most recently completed plan year before the filing date of the initial application (without regard to whether a contribution was made on account of a year other than the most recently completed plan year)? If this information is required, it is required for the 15 largest contributing employers even if the employer's contribution is less than 5% of total contributions. Enter N/A if the plan is not required to provide this information. See Template 2. Does the uploaded file use the required filenaming convention?	Yes No N/A	Yes	Rev2 Template 2 BCPEN.xlsx	N/A		Contributing employers	Template 2 Plan Name

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

APPLICATION CHECKLIST

Plan name:	Bakery and Confectionery Union and Industry International Pension Fund
EIN:	52-6118572
PN:	001
SFA Amount Requested:	\$3,199,389,088.00

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-----Filers provide responses here for each Checklist Item:-----

Unless otherwise specified:
YYYY = plan year
Plan Name = abbreviated plan name

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
15.	Section C, Item (3)	Does the application include historical plan information for the 2010 plan year through the plan year immediately preceding the date the plan's initial application was filed that separately identifies: total contributions, total contribution base units (including identification of the unit used), average contribution rates, and number of active participants at the beginning of each plan year? For the same period, does the application show all other sources of non-investment income such as withdrawal liability payments collected, reciprocity contributions (if applicable), additional contributions from the rehabilitation plan (if applicable), and other identifiable sources of contributions? See Template 3. Does the uploaded file use the required filenaming convention?	Yes No	Yes	Rev2 Template 3 BCPEN.xlsx	N/A		Historical Plan Financial Information (CBUs, contribution rates, contribution amounts, withdrawal liability payments)	Template 3 Plan Name
16.a.	Section C, Items (4)a., (4)e., and (4)f.	Does the application include the information used to determine the amount of SFA for the plan using the basic method described in § 4262.4(a)(1) based on a deterministic projection and using the actuarial assumptions as described in § 4262.4(e)? See Template 4A, 4A-4 SFA Details .4(a)(1) sheet and Section C, Item (4) of the SFA Filing Instructions for more details on these requirements. Does the uploaded file use the required filenaming convention?	Yes No	Yes	Rev2 Template 4A BCPEN.xlsx	N/A		Projections for special financial assistance (estimated income, benefit payments and expenses)	Template 4A Plan Name
16.b.i.	Addendum D Section C, Item (4)a. - MPRA plan information A. Addendum D Section C, Item (4)e. - MPRA plan information A.	If the plan is a MPRA plan, does the application also include the information used to determine the amount of SFA for the plan using the increasing assets method described in § 4262.4(a)(2)(i) based on a deterministic projection and using the actuarial assumptions as described in § 4262.4(e)? See Template 4A, 4A-5 SFA Details .4(a)(2)(i) sheet and Addendum D for more details on these requirements. Enter N/A if the plan is not a MPRA Plan.	Yes No N/A	N/A	N/A - included as part of Template 4A Plan Name	N/A		N/A	N/A - included in Template 4A Plan Name
16.b.ii.	Addendum D Section C, Item (4)f. - MPRA plan information A.	If the plan is a MPRA plan for which the requested amount of SFA is determined using the increasing assets method described in § 4262.4(a)(2)(i), does the application also explicitly identify the projected SFA exhaustion year based on the increasing assets method? See Template 4A, 4A-5 SFA Details .4(a)(2)(i) sheet and Addendum D. Enter N/A if the plan is not a MPRA Plan or if the requested amount of SFA is determined based on the present value method.	Yes No N/A	N/A	N/A - included as part of Template 4A Plan Name	N/A		N/A	N/A - included in Template 4A Plan Name

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

APPLICATION CHECKLIST

Plan name:	Bakery and Confectionery Union and Industry International Pension Fund
EIN:	52-6118572
PN:	001
SFA Amount Requested:	\$3,199,389,088.00

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
16.b.iii.	Addendum D Section C, Item (4)a. - MPRA plan information B Addendum D Section C, Item (4)c. (4)f., and (4)g. - MPRA plan information B.	If the plan is a MPRA plan for which the requested amount of SFA is determined using the <u>present value method</u> described in § 4262.4(a)(2)(ii), does the application also include the information for such plans as shown in Template 4B, including <i>4B-1 SFA Ben Pmts</i> sheet, <i>4B-2 SFA Details 4(a)(2)(ii)</i> sheet, and <i>4B-3 SFA Exhaustion</i> sheet? See Addendum D and Template 4B. Enter N/A if the plan is not a MPRA Plan or if the requested amount of SFA is determined based on the increasing assets method.	Yes No N/A	N/A		N/A		N/A	Template 4B Plan Name
16.c.	Section C, Items (4)b. and (4)c.	Does the application include identification of the non-SFA interest rate and the SFA interest rate, including details on how each was determined? See Template 4A, <i>4A-1 Interest Rates</i> sheet.	Yes No	Yes	N/A - included as part of Template 4A Plan Name	N/A		N/A	N/A - included in Template 4A Plan Name
16.d.	Section C, Item (4).e.ii.	For each year in the SFA coverage period, does the application include the projected benefit payments (excluding make-up payments, if applicable), separately for current retirees and beneficiaries, current terminated vested participants not yet in pay status, current active participants, and new entrants? See Template 4A, <i>4A-2 SFA Ben Pmts</i> sheet.	Yes No	Yes	N/A - included as part of Template 4A Plan Name	N/A		N/A	N/A - included in Template 4A Plan Name
16.e.	Section C, Item (4)e.iv. and (4)e.v.	For each year in the SFA coverage period, does the application include a breakdown of the administrative expenses between PBGC premiums and all other administrative expenses? Does the application include the projected total number of participants at the beginning of each plan year in the SFA coverage period? See Template 4A, <i>4A-3 SFA Pcount and Admin Exp</i> sheet.	Yes No	Yes	N/A - included as part of Template 4A Plan Name	N/A		N/A	N/A - included in Template 4A Plan Name
17.a.	Section C, Item (5)	For a plan that is not a MPRA plan, does the application include a separate deterministic projection ("Baseline") in the same format as Checklist Items #16.a., #16.d., and #16.e. that shows the amount of SFA that would be determined using the <u>basic method</u> if the assumptions/methods used are the same as those used in the most recent actuarial certification of plan status completed before January 1, 2021 ("pre-2021 certification of plan status") excluding the plan's non-SFA interest rate and SFA interest rate, which should be the same as in Checklist Item #16.a.? See Section C, Item (5) of the SFA Filing Instructions for other potential exclusions from this requirement. If (a) the plan is a MPRA plan, or if (b) this item is not required for a plan that is not a MPRA plan, enter N/A. If entering N/A due to (b), add information in the Plan Comments to explain why this item is not required. Does the uploaded file use the required filenaming convention?	Yes No N/A	Yes		N/A	Previously provided under first revised application. Rev Template 5A BCPEN.xlsx	Projections for special financial assistance (estimated income, benefit payments and expenses)	Template 5A Plan Name

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

APPLICATION CHECKLIST

Plan name:	Bakery and Confectionery Union and Industry International Pension Fund
EIN:	52-6118572
PN:	001
SFA Amount Requested:	\$3,199,389,088.00

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
17.b.	Addendum D Section C, Item (5)	For a MPRA plan for which the requested amount of SFA is determined using the <u>increasing assets method</u> , does the application include a separate deterministic projection ("Baseline") in the same format as Checklist Items #16.b.i., #16.d., and #16.e. that shows the amount of SFA that would be determined using the <u>increasing assets method</u> if the assumptions/methods used are the same as those used in the most recent actuarial certification of plan status completed before January 1, 2021 ("pre-2021 certification of plan status") excluding the plan's non-SFA interest rate and SFA interest rate, which should be the same as used in Checklist Item #16.b.i.? See Section C, Item (5) of the SFA Filing Instructions for other potential exclusions from this requirement. Also see Addendum D. If the plan is (a) not a MPRA plan, (b) a MPRA plan using the present value method, or (c) is otherwise not required to provide this item, enter N/A. If entering N/A due to (c), add information in the Plan Comments to explain why this item is not required. Does the uploaded file use the required filenaming convention?	Yes No N/A	N/A		N/A		Projections for special financial assistance (estimated income, benefit payments and expenses)	Template 5A Plan Name
17.c.	Addendum D Section C, Item (5)	For a MPRA plan for which the requested amount of SFA is determined using the <u>present value method</u> , does the application include a separate deterministic projection ("Baseline") in the same format as Checklist Item #16.b.iii. that shows the amount of SFA that would be determined using the <u>present value method</u> if the assumptions used/methods are the same as those used in the most recent actuarial certification of plan status completed before January 1, 2021 ("pre-2021 certification of plan status") excluding the plan's SFA interest rate which should be the same as used in Checklist Item #16.b.iii. See Section C, Item (5) of the SFA Filing Instructions for other potential exclusions from this requirement. Also see Addendum D. If the plan is (a) not a MPRA plan, (b) a MPRA plan using the increasing assets method, or (c) is otherwise not required to provide this item, enter N/A. If entering N/A due to (c), add information in the Plan Comments to explain why this item is not required. Has this document been uploaded using the required filenaming convention?	Yes No N/A	N/A		N/A		Projections for special financial assistance (estimated income, benefit payments and expenses)	Template 5B Plan Name

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

APPLICATION CHECKLIST

Plan name:	Bakery and Confectionery Union and Industry International Pension Fund
EIN:	52-6118572
PN:	001
SFA Amount Requested:	\$3,199,389,088.00

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
18.a.	Section C, Item (6)	For a plan that is not a MPRA plan, does the application include a reconciliation of the change in the total amount of requested SFA due to each change in assumption/method from the Baseline to the requested SFA amount? Does the application include a deterministic projection and other information for each assumption/method change, in the same format as Checklist Item #16.a? Enter N/A if the plan is not required to provide Baseline information in Checklist Item #17.a. Enter N/A if the requested SFA amount in Checklist Item #16.a. is the same as the amount shown in the Baseline details of Checklist Item #17.a. See Section C, Item (6) of the SFA Filing Instructions for other potential exclusions from this requirement. If the plan is a MPRA plan, enter N/A. If the plan is otherwise not required to provide this item, enter N/A and provide an explanation in the Plan Comments. Does the uploaded file use the required filenaming convention?	Yes No N/A	Yes	Rev2 Template 6A BCPEN.xlsx	N/A		Projections for special financial assistance (estimated income, benefit payments and expenses)	Template 6A Plan Name
18.b.	Addendum D Section C, Item (6)	For a MPRA plan for which the requested amount of SFA is based on the <u>increasing assets method</u> , does the application include a reconciliation of the change in the total amount of requested SFA using the <u>increasing assets method</u> due to each change in assumption/method from the Baseline to the requested SFA amount? Does the application include a deterministic projection and other information for each assumption/method change, in the same format as Checklist Item #16.b.i? Enter N/A if the plan is not required to provide Baseline information in Checklist Item #17.b. Enter N/A if the requested SFA amount in Checklist Item #16.b.i. is the same as the amount shown in the Baseline details of Checklist Item #17.b. See Addendum D. See Section C, Item (6) of the SFA Filing Instructions for other potential exclusions from this requirement, and enter N/A if this item is not otherwise required. If the plan is (a) not a MPRA plan, (b) a MPRA plan using the present value method, or (c) is otherwise not required to provide this item, enter N/A. If entering N/A due to (c), add information in the Plan Comments to explain why this item is not required. Does the uploaded file use the required filenaming convention?	Yes No N/A	N/A		N/A		Projections for special financial assistance (estimated income, benefit payments and expenses)	Template 6A Plan Name

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

APPLICATION CHECKLIST

Plan name:	Bakery and Confectionery Union and Industry International Pension Fund
EIN:	52-6118572
PN:	001
SFA Amount Requested:	\$3,199,389,088.00

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 Plan Name = abbreviated plan name

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
18.c.	Addendum D Section C, Item (6)	For a MPRA plan for which the requested amount of SFA is based on the <u>present value method</u> , does the application include a reconciliation of the change in the total amount of requested SFA using the <u>present value method</u> due to each change in assumption/method from Baseline to the requested SFA amount? Does the application include a deterministic projection and other information for each assumption/method change, in the same format as Checklist Item #16.b.iii? See Section C, Item (6) of the SFA Filing Instructions for other potential exclusions from this requirement. Also see Addendum D. If the plan is (a) not a MPRA plan, (b) a MPRA plan using the increasing assets method, or (c) is otherwise not required to provide this item, enter N/A. If entering N/A due to (c), add information in the Plan Comments to explain why this item is not required. Has this document been uploaded using the required filenaming convention?	Yes No N/A	N/A		N/A		Projections for special financial assistance (estimated income, benefit payments and expenses)	Template 6B Plan Name
19.a.	Section C, Item (7)a.	For plans eligible for SFA under § 4262.3(a)(1) or § 4262.3(a)(3), does the application include a table identifying which assumptions/methods used in determining the plan's eligibility for SFA differ from those used in the pre-2021 certification of plan status, and does that table include brief explanations as to why using those assumptions/methods is no longer reasonable and why the changed assumptions/methods are reasonable (an abbreviated version of information provided in Checklist Item #28.a.)? Enter N/A if the plan is eligible for SFA under § 4262.3(a)(2) or § 4262.3(a)(4) or if the plan is eligible based on a certification of plan status completed before 1/1/2021. Also enter N/A if the plan is eligible based on a certification of plan status completed after 12/31/2020 but that reflects the same assumptions as those in the pre-2021 certification of plan status. See Template 7, 7a Assump Changes for Elig sheet. Does the uploaded file include both Checklist Items #19.a. and #19.b., and does it use the required filenaming convention?	Yes No N/A	N/A		N/A		Financial assistance spreadsheet (template)	Template 7 Plan Name.

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

APPLICATION CHECKLIST

Plan name:	Bakery and Confectionery Union and Industry International Pension Fund
EIN:	52-6118572
PN:	001
SFA Amount Requested:	\$3,199,389,088.00

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
19.b.	Section C, Item (7)b.	Does the application include a table identifying which assumptions/methods used to determine the requested SFA differ from those used in the pre-2021 certification of plan status (except the interest rates used to determine SFA)? Does this item include brief explanations as to why using those original assumptions/methods is no longer reasonable and why the changed assumptions/methods are reasonable? If a changed assumption is an extension of the CBU assumption or the administrative expenses assumption as described in Paragraph A "Adoption of assumptions not previously factored into pre-2021 certification of plan status" of Section III, Acceptable Assumption Changes of PBGC's SFA assumptions guidance, does the application state so? This should be an abbreviated version of information provided in Checklist Item #28.b. See Template 7, 7b Assump Changes for Amount sheet. Does the uploaded file include both Checklist Items #19.a. and #19.b., and does it use the required filenaming convention?	Yes No	Yes	Rev2 Template 7 BCPEN.xlsx	N/A		Financial assistance spreadsheet (template)	Template 7 Plan Name
20.a.	Section C, Item (8)	Does the application include details of the projected contributions and withdrawal liability payments used to calculate the requested SFA amount, including total contributions, contribution base units (including identification of base unit used), average contribution rate(s), reciprocity contributions (if applicable), additional contributions from the rehabilitation plan (if applicable), and any other identifiable contribution streams? See Template 8.	Yes No	Yes	Rev2 Template 8 BCPEN.xlsx	N/A		Projections for special financial assistance (estimated income, benefit payments and expenses)	Template 8 Plan Name
20.b.		Does the application separately show the amounts of projected withdrawal liability payments for employers that are currently withdrawn as of the date the initial application is filed, and assumed future withdrawals? Does the application also provide the projected number of active participants at the beginning of each plan year? See Template 8.	Yes No	Yes	N/A - include as part of Checklist Item #20.a.	N/A		N/A	N/A - included in Template 8 Plan Name
21.	Section C, Item (10)	Does the application provide a table identifying and describing all assumptions and methods used in i) the pre-2021 certification of plan status, ii) the "Baseline" projection in Section C Item (5), and iii) the determination of the amount of SFA in Section C Item (4)? Does the table state if each changed assumption falls under Section III, Acceptable Assumption Changes, or Section IV, Generally Accepted Assumption Changes, in PBGC's SFA assumptions guidance, or if it should be considered an "Other Change"? Does the uploaded file use the required filenaming convention?	Yes No	Yes	Rev2 Template 10 BCPEN.xlsx	N/A		Financial assistance spreadsheet (template)	Template 10 Plan Name

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

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PN:	001
SFA Amount Requested:	\$3,199,389,088.00

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
22.	Section D	Was the application signed and dated by an authorized trustee who is a current member of the board of trustees or another authorized representative of the plan sponsor and include the printed name and title of the signer?	Yes No	Yes	Rev2 SFA App BCPEN.pdf	Page 1	Identify here the name of the single document that includes all information requested in Section D of the SFA Filing Instructions (Checklist Items #22 through #29.c.).	Financial Assistance Application	SFA App Plan Name
23.a.		For a plan that is not a MPRA plan, does the application include an optional cover letter? Enter N/A if the plan is a MPRA plan, or if the plan is not a MPRA plan and did not include an optional cover letter.	Yes N/A	Yes	N/A - included as part of SFA App Plan Name	Page 1	For each Checklist Item #22 through #29.c., identify the relevant page number(s) within the single document.	N/A	N/A - included as part of SFA App Plan Name
23.b.	Section D, Item (1)	For a plan that is a MPRA plan, does the application include a cover letter? Does the cover letter identify the calculation method (basic method, increasing assets method, or present value method) that provides the greatest amount of SFA? For a MPRA plan with a partition, does the cover letter include a statement that the plan has been partitioned under section 4233 of ERISA? Enter N/A if the plan is not a MPRA plan.	Yes No N/A	N/A	N/A - included as part of SFA App Plan Name			N/A	N/A - included as part of SFA App Plan Name
24.	Section D, Item (2)	Does the application include the name, address, email, and telephone number of the plan sponsor, plan sponsor's authorized representative, and any other authorized representatives?	Yes No	Yes	N/A - included as part of SFA App Plan Name	Page 2		N/A	N/A - included as part of SFA App Plan Name
25.	Section D, Item (3)	Does the application identify the eligibility criteria in § 4262.3 that qualifies the plan as eligible to receive SFA, and include the requested information for each item that is applicable, as described in Section D, Item (3) of the SFA Filing Instructions?	Yes No	Yes	N/A - included as part of SFA App Plan Name	Page 3	The Plan is eligible for SFA because it has been certified by its actuary to be in critical and declining status for plan year beginning January 1, 2020.	N/A	N/A - included as part of SFA App Plan Name
26.a.		If the plan's application is submitted on or before March 11, 2023, does the application identify the plan's priority group (see § 4262.10(d)(2))? Enter N/A if the plan's application is submitted after March 11, 2023.	Yes No N/A	N/A	N/A - included as part of SFA App Plan Name		The Plan is in priority group 6, as listed on the PBGC website.	N/A	N/A - included as part of SFA App Plan Name
26.b.	Section D, Item (4)	If the plan is submitting an emergency application under § 4262.10(f), is the application identified as an emergency application with the applicable emergency criteria identified? Enter N/A if the plan is not submitting an emergency application.	Yes No N/A	N/A	N/A - included as part of SFA App Plan Name			N/A	N/A - included as part of SFA App Plan Name

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

APPLICATION CHECKLIST

Plan name:	Bakery and Confectionery Union and Industry International Pension Fund
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Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
27.	Section D, Item (5)	Does the application include a detailed narrative description of the development of the assumed future contributions and assumed future withdrawal liability payments used in the basic method (and in the increasing assets method for a MPRA plan)?	Yes No	Yes	N/A - included as part of SFA App Plan Name	Page 3		N/A	N/A - included as part of SFA App Plan Name
28.a.	Section D, Item (6)a.	For plans eligible for SFA under § 4262.3(a)(1) or § 4262.3(a)(3), does the application identify which assumptions/methods (if any) used in showing the plan's eligibility for SFA differ from those used in the most recent certification of plan status completed before 1/1/2021? If there are any assumption/method changes, does the application include detailed explanations and supporting rationale and information as to why using the identified assumptions/methods is no longer reasonable and why the changed assumptions/methods are reasonable? Enter N/A if the plan is not eligible under § 4262.3(a)(1) or § 4262.3(a)(3). Enter N/A if there are no such assumption changes.	Yes No N/A	N/A	N/A - included as part of SFA App Plan Name			N/A	N/A - included as part of SFA App Plan Name
28.b.	Section D, Item (6)b.	Does the application identify which assumptions/methods (if any) used to determine the requested SFA amount differ from those used in the most recent certification of plan status completed before 1/1/2021 (excluding the plan's non-SFA and SFA interest rates, which must be the same as the interest rates required by § 4262.4(e)(1) and (2))? If there are any assumption/method changes, does the application include detailed explanations and supporting rationale and information as to why using the identified original assumptions/methods is no longer reasonable and why the changed assumptions/methods are reasonable? Does the application state if the changed assumption is an extension of the CBU assumption or the administrative expenses assumption as described in Paragraph A "Adoption of assumptions not previously factored into pre-2021 certification of plan status" of Section III, Acceptable Assumption Changes of PBGC's SFA Assumptions?	Yes No	Yes	N/A - included as part of SFA App Plan Name	Pages 4 - 19		N/A	N/A - included as part of SFA App Plan Name
28.c.	Section D, Item (6)	If the mortality assumption uses a plan-specific mortality table or a plan-specific adjustment to a standard mortality table (regardless of if the mortality assumption is changed or unchanged from that used in the most recent certification of plan status completed before 1/1/2021), is supporting information provided that documents the methodology used and the rationale for selection of the methodology used to develop the plan-specific rates, as well as detailed information showing the determination of plan credibility and plan experience? Enter N/A is the mortality assumption does not use a plan-specific mortality table or a plan-specific adjustment to a standard mortality table for eligibility or for determining the SFA amount.	Yes No N/A	N/A	N/A - included as part of SFA App Plan Name			N/A	N/A - included as part of SFA App Plan Name

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

APPLICATION CHECKLIST

Plan name:	Bakery and Confectionery Union and Industry International Pension Fund
EIN:	52-6118572
PN:	001
SFA Amount Requested:	\$3,199,389,088.00

Do NOT use this Application Checklist for a supplemented application. Instead use Application Checklist - Supplemented.

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 YYYY = plan year
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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
29.a.	Section D, Item (7)	Does the application include, for an eligible plan that implemented a suspension of benefits under section 305(e)(9) or section 4245(a) of ERISA, a narrative description of how the plan will reinstate the benefits that were previously suspended and a proposed schedule of payments (equal to the amount of benefits previously suspended) to participants and beneficiaries? Enter N/A for a plan that has not implemented a suspension of benefits.	Yes No N/A	N/A	N/A - included as part of SFA App Plan Name			N/A	N/A - included as part of SFA App Plan Name
29.b.	Section D, Item (7)	If Yes was entered for Checklist Item #29.a., does the proposed schedule show the yearly aggregate amount and timing of such payments, and is it prepared assuming the effective date for reinstatement is the day after the SFA measurement date? Enter N/A for a plan that entered N/A for Checklist Item #29.a.	Yes No N/A	N/A	N/A - included as part of SFA App Plan Name			N/A	N/A - included as part of SFA App Plan Name
29.c.	Section D, Item (7)	If the plan restored benefits under 26 CFR 1.432(e)(9)-1(e)(3) before the SFA measurement date, does the proposed schedule reflect the amount and timing of payments of restored benefits and the effect of the restoration on the benefits remaining to be reinstated? Enter N/A for a plan that did not restore benefits under 26 CFR 1.432(e)(9)-1(e)(3) before the SFA measurement date. Also enter N/A for a plan that entered N/A for Checklist Items #29.a. and #29.b.	Yes No N/A	N/A	N/A - included as part of SFA App Plan Name			N/A	N/A - included as part of SFA App Plan Name
30.a.	Section E, Item (1)	Does the application include a fully completed Application Checklist, including the required information at the top of the Application Checklist (plan name, employer identification number (EIN), 3-digit plan number (PN), and SFA amount requested)?	Yes No	Yes	Rev2 App Checklist BCPEN.xlsx	N/A		Special Financial Assistance Checklist	App Checklist Plan Name
30.b.	Section E, Item (1) - Addendum A	If the plan is required to provide information required by Addendum A of the SFA Filing Instructions (for "certain events"), are the additional Checklist Items #40.a. through #49.b. completed? Enter N/A if the plan is not required to submit the additional information described in Addendum A.	Yes No N/A	N/A	N/A	N/A		Special Financial Assistance Checklist	N/A

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

APPLICATION CHECKLIST

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
31.	Section E, Item (2)	<p>If the plan claims SFA eligibility under § 4262.3(a)(1) of PBGC's SFA regulation based on a certification by the plan's enrolled actuary of plan status for SFA eligibility purposes completed on or after January 1, 2021, does the application include:</p> <p>(i) plan actuary's certification of plan status for SFA eligibility purposes for the specified year (and, if applicable, for each plan year after the plan year for which the pre-2021 zone certification was prepared and for the plan year immediately prior to the specified year)?</p> <p>(ii) for each certification in (i) above, does the application include all details and additional information described in Section B, Item (5) of the SFA Filing Instructions, including clear documentation of all assumptions, methods and census data used?</p> <p>(iii) for each certification in (i) above, does the application identify all assumptions and methods that are different from those used in the pre-2021 zone certification?</p> <p>Does the certification by the plan's enrolled actuary include clear indication of all assumptions and methods used including source of and date of participant data, measurement date, and a statement that the actuary is qualified to render the actuarial opinion?</p> <p>If the plan does not claim SFA eligibility under § 4262.3(a)(1) or claims SFA eligibility under § 4262.3(a)(1) using a zone certification completed before January 1, 2021, enter N/A.</p> <p>Is the information for this Checklist Item #31 contained in a single document and uploaded using the required filenaming convention?</p>	Yes No N/A	N/A		N/A		Financial Assistance Application	SFA Elig Cert CD Plan Name

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
32.a.	Section E, Item (3)	<p>If the plan claims SFA eligibility under § 4262.3(a)(3) of PBGC's SFA regulation based on a certification by the plan's enrolled actuary of plan status for SFA eligibility purposes completed on or after January 1, 2021, does the application include:</p> <p>(i) plan actuary's certification of plan status for SFA eligibility purposes for the specified year (and, if applicable, for each plan year after the plan year for which the pre-2021 zone certification was prepared and for the plan year immediately prior to the specified year)?</p> <p>(ii) for each certification in (i) above, does the application include all details and additional information described in Section B, Item (5) of the SFA Filing Instructions, including clear documentation of all assumptions, methods and census data used?</p> <p>(iii) for each certification in (i) above, does the application identify all assumptions and methods that are different from those used in the pre-2021 zone certification?</p> <p>Does the certification by the plan's enrolled actuary include clear indication of all assumptions and methods used including source of and date of participant data, measurement date, and a statement that the actuary is qualified to render the actuarial opinion?</p> <p>If the plan does not claim SFA eligibility under § 4262.3(a)(3) or claims SFA eligibility under § 4262.3(a)(3) using a zone certification completed before January 1, 2021, enter N/A.</p> <p>Is the information for Checklist Items #32.a. and #32.b. contained in a single document and uploaded using the required filenaming convention?</p>		N/A		N/A		Financial Assistance Application	SFA Elig Cert C Plan Name
32.b.	Section E, Item (3)	<p>If the plan claims SFA eligibility under § 4262.3(a)(3) of PBGC's SFA regulation, does the application include a certification from the plan's enrolled actuary that the plan qualifies for SFA based on the applicable certification of plan status for SFA eligibility purposes for the specified year, and by meeting the other requirements of § 4262.3(c) of PBGC's SFA regulation. Does the provided certification include:</p> <p>(i) identification of the specified year for each component of eligibility (certification of plan status for SFA eligibility purposes, modified funding percentage, and participant ratio)</p> <p>(ii) derivation of the modified funded percentage</p> <p>(iii) derivation of the participant ratio</p> <p>Does the certification identify what test(s) under section 305(b)(2) of ERISA is met for the specified year listed above?</p> <p>Does the certification identify all assumptions and methods (including supporting rationale, and where applicable, reliance on the plan sponsor) used to develop the withdrawal liability receivable that is utilized in the calculation of the modified funded percentage?</p> <p>Enter N/A if the plan does not claim SFA eligibility under §4262.3(a)(3).</p>	Yes No N/A	N/A	N/A - included with SFA Elig Cert C Plan Name	N/A		Financial Assistance Application	N/A - included in SFA Elig Cert C Plan Name

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
33.	Section E, Item (4)	<p>If the plan's application is submitted on or prior to March 11, 2023, does the application include a certification from the plan's enrolled actuary that the plan is eligible for priority status, with specific identification of the applicable priority group?</p> <p>This item is not required (enter N/A) if the plan is insolvent, has implemented a MPRA suspension as of 3/11/2021, is in critical and declining status and had 350,000+ participants, or is listed on PBGC's website at www.pbgc.gov as being in priority group 6. See § 4262.10(d).</p> <p>Does the certification by the plan's enrolled actuary include clear indication of all assumptions and methods used including source of and date of participant data, measurement date, and a statement that the actuary is qualified to render the actuarial opinion?</p> <p>Is the filename uploaded using the required filenaming convention?</p>	Yes No N/A	N/A		N/A		Financial Assistance Application	PG Cert Plan Name
34.a.		<p>Does the application include the certification by the plan's enrolled actuary that the requested amount of SFA is the amount to which the plan is entitled under section 4262(j)(1) of ERISA and § 4262.4 of PBGC's SFA regulation? Does this certification include:</p> <p>(i) plan actuary's certification that identifies the requested amount of SFA and certifies that this is the amount to which the plan is entitled?</p> <p>(ii) clear indication of all assumptions and methods used including source of and date of participant data, measurement date, and a statement that the actuary is qualified to render the actuarial opinion?</p> <p>Is the information in Checklist #34.a. combined with #34.b. (if applicable) as a single document, and uploaded using the required filenaming convention?</p>	Yes No	Yes	Rev2 SFA Amount Cert BCPEN.pdf	N/A		Financial Assistance Application	SFA Amount Cert Plan Name

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
34.b.	Section E, Item (5)	<p>If the plan is a MPRA plan, does the certification by the plan's enrolled actuary identify the amount of SFA determined under the basic method described in § 4262.4(a)(1) and the amount determined under the increasing assets method in § 4262.4(a)(2)(i)?</p> <p>If the amount of SFA determined under the "present value method" described in § 4262.4(a)(2)(ii) is not the greatest amount of SFA under § 4262.4(a)(2), does the certification state as such?</p> <p>If the amount of SFA determined under the "present value method" described in § 4262.4(a)(2)(ii) is the greatest amount of SFA under § 4262.4(a)(2), does the certification identify that amount?</p> <p>Enter N/A if the plan is not a MPRA plan.</p>	Yes No N/A	N/A	N/A - included with SFA Amount Cert Plan Name	N/A		N/A - included in SFA Amount Cert Plan Name	N/A - included in SFA Amount Cert Plan Name
35.	Section E, Item (6)	<p>Does the application include the plan sponsor's identification of the amount of fair market value of assets at the SFA measurement date and certification that this amount is accurate? Does the application also include:</p> <p>(i) information that substantiates the asset value and how it was developed (e.g., trust or account statements, specific details of any adjustments)?</p> <p>(ii) a reconciliation of the fair market value of assets from the date of the most recent audited plan financial statements to the SFA measurement date (showing beginning and ending fair market value of assets for this period as well as the following items for the period: contributions, withdrawal liability payments, benefits paid, administrative expenses, and investment income)?</p> <p>With the exception of account statements and financial statements already provided as Checklist Items #8 and #9, is all information contained in a single document that is uploaded using the required filenaming convention?</p>	Yes No	Yes		N/A	Previously provided under first revised application. <i>Rev FMV Cert BCPEN.pdf</i>	Financial Assistance Application	<i>FMV Cert Plan Name</i>
36.	Section E, Item (7)	<p>Does the application include a copy of the executed plan amendment required by § 4262.6(e)(1) of PBGC's SFA regulation which (i) is signed by authorized trustee(s) of the plan and (ii) includes the plan compliance language in Section E, Item (7) of the SFA Filing Instructions?</p>	Yes No	Yes		N/A	Previously provided under initial application. <i>PlanDocAmends BCPEN.pdf</i>	Pension plan documents, all versions available, and all amendments signed and dated	<i>Compliance Amend Plan Name</i>

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
37.	Section E, Item (8)	In the case of a plan that suspended benefits under section 305(e)(9) or section 4245 of ERISA, does the application include: (i) a copy of the proposed plan amendment(s) required by § 4262.6(e)(2) to reinstate suspended benefits and pay make-up payments? (ii) a certification by the plan sponsor that the proposed plan amendment(s) will be timely adopted? Is the certification signed by either all members of the plan's board of trustees or by one or more trustees duly authorized to sign the certification on behalf of the entire board (including, if applicable, documentation that substantiates the authorization of the signing trustees)? Enter N/A if the plan has not suspended benefits. Is all information included in a single document that is uploaded using the required filenaming convention?	Yes No N/A	N/A		N/A		Pension plan documents, all versions available, and all amendments signed and dated	Reinstatement Amend Plan Name
38.	Section E, Item (9)	In the case of a plan that was partitioned under section 4233 of ERISA, does the application include a copy of the executed plan amendment required by § 4262.9(c)(2)? Enter N/A if the plan was not partitioned. Is the document uploaded using the required filenaming convention?	Yes No N/A	N/A		N/A		Pension plan documents, all versions available, and all amendments signed and dated	Partition Amend Plan Name
39.	Section E, Item (10)	Does the application include one or more copies of the penalties of perjury statement (see Section E, Item (10) of the SFA Filing Instructions) that (a) are signed by an authorized trustee who is a current member of the board of trustees, and (b) includes the trustee's printed name and title. Is all such information included in a single document and uploaded using the required filenaming convention?	Yes No	Yes	Rev2 Penalty BCPEN.pdf	N/A		Financial Assistance Application	Penalty Plan Name

Additional Information for Certain Events under § 4262.4(f) - Applicable to Any Events in § 4262.4(f)(2) through (f)(4) and Any Mergers in § 4262.4(f)(1)(ii)

NOTE: If the plan is not required to provided information described in Addendum A of the SFA Filing Instructions, the Plan Response should be left blank for the remaining Checklist Items.

40.a.	Addendum A for Certain Events Section C, Item (4)	Does the application include an additional version of Checklist Item #16.a. (also including Checklist Items #16.c., #16.d., and #16.e.), that shows the determination of the SFA amount <u>using the basic method</u> described in § 4262.4(a)(1) as if <u>any events had not occurred</u> ? See Template 4A.	Yes No			N/A		Projections for special financial assistance (estimated income, benefit payments and expenses)	For additional submission due to any event: <i>Template 4A Plan Name CE</i> . For an additional submission due to a merger, <i>Template 4A Plan Name Merged</i> , where "Plan Name Merged" is an abbreviated version of the plan name for the separate plan involved in the merger.
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Application to PBGC for Approval of Special Financial Assistance (SFA)

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Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
40.b.i.	Addendum A for Certain Events Section C, Item (4)	If the plan is a MPRA plan for which the requested amount of SFA is based on the <u>increasing assets method</u> described in § 4262.4(a)(2)(i), does the application also include an additional version of Checklist Item #16.b.i. that shows the determination of the SFA amount using the <u>increasing assets method</u> as if any events had not occurred? See Template 4A, sheet <i>4A-5 SFA Details .5(a)(2)(i)</i> . Enter N/A if the plan is not a MPRA Plan or if the plan is a MPRA plan for which the requested amount of SFA is based on the present value method.	Yes No N/A		N/A - included as part of file in Checklist Item #40.a.	N/A		N/A	N/A - included as part of file in Checklist Item #40.a.
40.b.ii.	Addendum A for Certain Events Section C, Item (4)	If the plan is a MPRA plan for which the requested amount of SFA is based on the <u>increasing assets method</u> described in § 4262.4(a)(2)(i), does the application also include an additional version of Checklist Item #16.b.ii. that explicitly identifies the projected SFA exhaustion year based on the <u>increasing assets method</u> ? See Template 4A, <i>4A-5 SFA Details .4(a)(2)(i)</i> sheet and Addendum D. Enter N/A if the plan is not a MPRA Plan or if the plan is a MPRA plan for which the requested amount of SFA is based on the present value method.	Yes No N/A			N/A		N/A	N/A - included as part of file in Checklist Item #40.a.
40.b.iii.	Addendum A for Certain Events Section C, Item (4)	If the plan is a MPRA plan for which the requested amount of SFA is based on the <u>present value method</u> described in § 4262.4(a)(2)(ii), does the application also include an additional version of Checklist Item #16.b.iii. that shows the determination of the SFA amount using the <u>present value method</u> as if any events had not occurred? See Template 4B, sheet <i>4B-1 SFA Ben Pmts</i> , sheet <i>4B-2 SFA Details .4(a)(2)(ii)</i> , and sheet <i>4B-3 SFA Exhaustion</i> . Enter N/A if the plan is not a MPRA Plan or if the plan is a MPRA plan for which the requested amount of SFA is based on the increasing assets method.	Yes No N/A			N/A		Projections for special financial assistance (estimated income, benefit payments and expenses)	For additional submission due to any event: <i>Template 4B Plan Name CE</i> . For an additional submission due to a merger, <i>Template 4B Plan Name Merged</i> , where "Plan Name Merged" is an abbreviated version of the plan name for the separate plan involved in the merger.
41.	Addendum A for Certain Events Section C, Item (4)	For any merger, does the application show the SFA determination for this plan <u>and for each plan merged into this plan</u> (each of these determined as if they were still separate plans)? See Template 4A for a non-MPRA plan using the basic method, and for a MPRA plan using the increasing assets method. See Template 4B for a MPRA Plan using the present value method. Enter N/A if the plan has not experienced a merger.	Yes No N/A			N/A		Projections for special financial assistance (estimated income, benefit payments and expenses)	For an additional submission due to a merger, <i>Template 4A (or Template 4B) Plan Name Merged</i> , where "Plan Name Merged" is an abbreviated version of the plan name for the separate plan involved in the merger.

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Your application will be considered incomplete if No is entered as a Plan Response for any of Checklist Items #1 through #39. In addition, if required to provide information due to a "certain event" (see Addendum A of the SFA Filing Instructions), your application will be considered incomplete if No is entered as a Plan Response for any Checklist Items #40.a. through #49.b. If there is a merger event described in Addendum A, your application will also be considered incomplete if No is entered as a Plan Response for any Checklist Items #50 through #63.

Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
42.a.	Addendum A for Certain Events Section D	Does the application include a narrative description of any event and any merger, including relevant supporting documents which may include plan amendments, collective bargaining agreements, actuarial certifications related to a transfer or merger, or other relevant materials?	Yes No		N/A - included as part of SFA App Plan Name		For each Checklist Item #42.a. through #45.b., identify the relevant page number(s) within the single document.	Financial Assistance Application	SFA App Plan Name
42.b.	Addendum A for Certain Events Section D	For a transfer or merger event, does the application include identifying information for all plans involved including plan name, EIN and plan number, and the date of the transfer or merger?	Yes No		N/A - included as part of SFA App Plan Name			Financial Assistance Application	N/A - included as part of SFA App Plan Name
43.a.	Addendum A for Certain Events Section D	Does the narrative description in the application identify the amount of SFA reflecting any event, the amount of SFA determined as if the event had not occurred, and confirmation that the requested SFA is no greater than the amount that would have been determined if the event had not occurred, unless the event is a contribution rate reduction and such event lessens the risk of loss to plan participants and beneficiaries?	Yes No		N/A - included as part of SFA App Plan Name			Financial Assistance Application	N/A - included as part of SFA App Plan Name
43.b.	Addendum A for Certain Events Section D	For a merger, is the determination of SFA as if the event had not occurred equal to the sum of the amount that would be determined for this plan and each plan merged into this plan (each as if they were still separate plans)? Enter N/A if the event described in Checklist Item #42.a. was not a merger.	Yes No N/A		N/A - included as part of SFA App Plan Name			Financial Assistance Application	N/A - included as part of SFA App Plan Name
44.a.	Addendum A for Certain Events Section D	Does the application include an additional version of Checklist Item #25 that shows the determination of SFA eligibility as if any events had not occurred?	Yes No		N/A - included as part of SFA App Plan Name			Financial Assistance Application	N/A - included as part of SFA App Plan Name
44.b.	Addendum A for Certain Events Section D	For any merger, does this item include demonstrations of SFA eligibility for this plan and for each plan merged into this plan (each of these determined as if they were still separate plans)? Enter N/A if the event described in Checklist Item #42.a. was not a merger.	Yes No N/A		N/A - included as part of SFA App Plan Name			Financial Assistance Application	N/A - included as part of SFA App Plan Name

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

APPLICATION CHECKLIST

Do NOT use this Application Checklist for a supplemented application. Instead use Application Checklist - Supplemented.

Plan name:	Bakery and Confectionery Union and Industry International Pension Fund
EIN:	52-6118572
PN:	001
SFA Amount Requested:	\$3,199,389,088.00

-----Filers provide responses here for each Checklist Item:-----

Unless otherwise specified:
 YYYY = plan year
 Plan Name = abbreviated plan name

Your application will be considered incomplete if No is entered as a Plan Response for any of Checklist Items #1 through #39. In addition, if required to provide information due to a "certain event" (see Addendum A of the SFA Filing Instructions), your application will be considered incomplete if No is entered as a Plan Response for any Checklist Items #40.a. through #49.b. If there is a merger event described in Addendum A, your application will also be considered incomplete if No is entered as a Plan Response for any Checklist Items #50 through #63.

Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
45.a.	Addendum A for Certain Events Section D	If the event is a contribution rate reduction and the amount of requested SFA is not limited to the amount of SFA determined as if the event had not occurred, does the application include a detailed demonstration that shows that the event lessens the risk of loss to plan participants and beneficiaries? Enter N/A if the event is not a contribution rate reduction, or if the event is a contribution rate reduction but the requested SFA is limited to the amount of SFA determined as if the event had not occurred.	Yes No N/A		N/A - included as part of SFA App Plan Name			Financial Assistance Application	N/A - included as part of SFA App Plan Name
45.b.	Addendum A for Certain Events Section D	Does the demonstration in Checklist Item #45.a. also identify all assumptions used, supporting rationale for the assumptions and other relevant information? Enter N/A if the plan entered N/A for Checklist Item #45.a.	Yes No N/A		N/A - included as part of SFA App Plan Name			Financial Assistance Application	N/A - included as part of SFA App Plan Name
46.a.	Addendum A for Certain Events Section E, Items (2) and (3)	Does the application include an additional certification from the plan's enrolled actuary with respect to the plan's SFA eligibility but with eligibility determined as if any events had not occurred? This should be in the format of Checklist Item #31 if the SFA eligibility is based on the plan status of critical and declining using a zone certification completed on or after January 1, 2021. This should be in the format of Checklist Items #32.a. and #32.b. if the SFA eligibility is based on the plan status of critical using a zone certification completed on or after January 1, 2021. If the above SFA eligibility is not based on § 4262.3(a)(1) or § 4262.3(a)(3) or is based on a zone certification completed prior to January 1, 2021, enter N/A. Is all relevant information contained in a single document and uploaded using the required filenaming convention?	Yes No N/A			N/A		Financial Assistance Application	SFA Elig Cert Plan Name CE
46.b.	Addendum A for Certain Events Section E, Items (2) and (3)	For any merger, does the application include additional certifications of the SFA eligibility for this plan and for each plan merged into this plan (each of these determined as if they were still separate plans)? If the above SFA eligibility is not based on § 4262.3(a)(1) or § 4262.3(a)(3) or is based on a zone certification completed prior to January 1, 2021, enter N/A. Enter N/A if the event described in Checklist Item #42.a. was not a merger.	Yes No N/A			N/A		Financial Assistance Application	SFA Elig Cert Plan Name Merged CE "Plan Name Merged" is an abbreviated version of the plan name for the separate plan involved in the merger.

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

APPLICATION CHECKLIST

Do NOT use this Application Checklist for a supplemented application. Instead use Application Checklist - Supplemented.

Plan name:	Bakery and Confectionery Union and Industry International Pension Fund
EIN:	52-6118572
PN:	001
SFA Amount Requested:	\$3,199,389,088.00

-----Filers provide responses here for each Checklist Item:-----

Unless otherwise specified:
YYYY = plan year
Plan Name = abbreviated plan name

Your application will be considered incomplete if No is entered as a Plan Response for any of Checklist Items #1 through #39. In addition, if required to provide information due to a "certain event" (see Addendum A of the SFA Filing Instructions), your application will be considered incomplete if No is entered as a Plan Response for any Checklist Items #40.a. through #49.b. If there is a merger event described in Addendum A, your application will also be considered incomplete if No is entered as a Plan Response for any Checklist Items #50 through #63.

Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
47.a.	Addendum A for Certain Events Section E, Item (5)	Does the application include an additional certification from the plan's enrolled actuary with respect to the plan's SFA amount (in the format of Checklist Item #34.a.), but with the SFA amount determined as if any events had not occurred?	Yes No			N/A		Financial Assistance Application	SFA Amount Cert Plan Name CE
47.b.	Addendum A for Certain Events Section E, Item (5)	If the plan is a MPRA plan, does the certification in Checklist Item #46.a. identify the amount of SFA determined under the basic method described in § 4262.4(a)(1) and the amount determined under the increasing assets method in § 4262.4(a)(2)(i)? If the amount of SFA determined under the "present value method" described in § 4262.4(a)(2)(ii) is not the greatest amount of SFA under § 4262.4(a)(2), does the certification state as such? If the amount of SFA determined under the "present value method" described in § 4262.4(a)(2)(ii) is the greatest amount of SFA under § 4262.4(a)(2), does the certification identify that amount? Enter N/A if the plan is not a MPRA plan.	Yes No N/A		N/A - included in SFA Amount Cert Plan Name CE	N/A		N/A - included in SFA Amount Cert Plan Name	N/A - included in SFA Amount Cert Plan Name CE
47.c.	Addendum A for Certain Events Section E, Item (5)	Does the certification in Checklist Items #47.a. and #47.b. (if applicable) clearly identify all assumptions and methods used, sources of participant data and census data, and other relevant information?	Yes No		N/A - included in SFA Amount Cert Plan Name CE	N/A		N/A - included in SFA Amount Cert Plan Name	N/A - included in SFA Amount Cert Plan Name CE
48.a.	Addendum A for Certain Events Section E, Item (5)	For any merger, does the application include additional certifications of the SFA amount determined for this plan and for each plan merged into this plan (each of these determined as if they were still separate plans)? Enter N/A if the event described in Checklist Item #42.a. was not a merger.	Yes No N/A			N/A		Financial Assistance Application	SFA Amount Cert Plan Name Merged CE "Plan Name Merged" is an abbreviated version of the plan name for the separate plan involved in the merger.
48.b.	Addendum A for Certain Events Section E, Item (5)	For any merger, do the certifications clearly identify all assumptions and methods used, sources of participant data and census data, and other relevant information? Enter N/A if the event described in Checklist Item #42.a. was not a merger.	Yes No N/A		N/A - included in SFA Amount Cert Plan Name CE	N/A		N/A - included in SFA Amount Cert Plan Name CE	N/A - included in SFA Amount Cert Plan Name CE

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

APPLICATION CHECKLIST

Plan name:	Bakery and Confectionery Union and Industry International Pension Fund
EIN:	52-6118572
PN:	001
SFA Amount Requested:	\$3,199,389,088.00

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Unless otherwise specified:
YYYY = plan year
Plan Name = abbreviated plan name

Your application will be considered incomplete if No is entered as a Plan Response for any of Checklist Items #1 through #39. In addition, if required to provide information due to a "certain event" (see Addendum A of the SFA Filing Instructions), your application will be considered incomplete if No is entered as a Plan Response for any Checklist Items #40.a. through #49.b. If there is a merger event described in Addendum A, your application will also be considered incomplete if No is entered as a Plan Response for any Checklist Items #50 through #63.

Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
49.a.	Addendum A for Certain Events Section E	If the event is a contribution rate reduction and the amount of requested SFA is not limited to the amount of SFA determined as if the event had not occurred, does the application include a certification from the plan's enrolled actuary (or, if appropriate, from the plan sponsor) with respect to the demonstration to support a finding that the event lessens the risk of loss to plan participants and beneficiaries? Enter N/A if the event is not a contribution rate reduction, or if the event is a contribution rate reduction but the requested SFA is limited to the amount of SFA determined as if the event had not occurred.	Yes No N/A			N/A		Financial Assistance Application	Cont Rate Cert Plan Name CE
49.b.	Addendum A for Certain Events Section E	Does the demonstration in Checklist Item #48.a. also identify all assumptions used, supporting rationale for the assumptions and other relevant information? Enter N/A if the event is not a contribution rate reduction, or if the event is a contribution rate reduction but the requested SFA is limited to the amount of SFA determined as if the event had not occurred.	Yes No N/A		N/A - included in Cont Rate Cert Plan Name CE	N/A		N/A - included in Cont Rate Cert Plan Name CE	N/A - included in Cont Rate Cert Plan Name CE

Additional Information for Certain Events under § 4262.4(f) - Applicable Only to Any Mergers in § 4262.4(f)(1)(ii)

Plans that have experienced mergers identified in § 4262.4(f)(1)(ii) must complete Checklist Items #50 through #63. If you are required to complete Checklist Items #50 through #63, your application will be considered incomplete if No is entered as a Plan Response for any of Checklist Items #50 through #63. All other plans should not provide any responses for Checklist Items #50 through #63.

50.	Addendum A for Certain Events Section B, Item (1)a.	In addition to the information provided with Checklist Item #1, does the application also include similar plan documents and amendments for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)?	Yes No			N/A		Pension plan documents, all versions available, and all amendments signed and dated	N/A
51.	Addendum A for Certain Events Section B, Item (1)b.	In addition to the information provided with Checklist Item #2, does the application also include similar trust agreements and amendments for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)?	Yes No			N/A		Pension plan documents, all versions available, and all amendments signed and dated	N/A
52.	Addendum A for Certain Events Section B, Item (1)c.	In addition to the information provided with Checklist Item #3, does the application also include the most recent IRS determination for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)? Enter N/A if the plan does not have a determination letter.	Yes No N/A			N/A		Pension plan documents, all versions available, and all amendments signed and dated	N/A

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

APPLICATION CHECKLIST

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EIN:	52-6118572
PN:	001
SFA Amount Requested:	\$3,199,389,088.00

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-----Filers provide responses here for each Checklist Item:-----

Unless otherwise specified:
 YYYY = plan year
 Plan Name = abbreviated plan name

Your application will be considered incomplete if No is entered as a Plan Response for any of Checklist Items #1 through #39. In addition, if required to provide information due to a "certain event" (see Addendum A of the SFA Filing Instructions), your application will be considered incomplete if No is entered as a Plan Response for any Checklist Items #40.a. through #49.b. If there is a merger event described in Addendum A, your application will also be considered incomplete if No is entered as a Plan Response for any Checklist Items #50 through #63.

Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
53.	Addendum A for Certain Events Section B, Item (2)	In addition to the information provided with Checklist Item #4, for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii), does the application include the actuarial valuation report for the 2018 plan year and each subsequent actuarial valuation report completed before the application filing date?	Yes No			N/A	Identify here how many reports are provided.	Most recent actuarial valuation for the plan	YYYYAVR Plan Name Merged, where "Plan Name Merged" is abbreviated version of the plan name for the plan merged into this plan.
54.	Addendum A for Certain Events Section B, Item (3)	In addition to the information provided with Checklist Items #5.a. and #5.b., does the application include similar rehabilitation plan information for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)?	Yes No			N/A		Rehabilitation plan (or funding improvement plan, if applicable)	N/A
55.	Addendum A for Certain Events Section B, Item (4)	In addition to the information provided with Checklist Item #6, does the application include similar Form 5500 information for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)?	Yes No			N/A		Latest annual return/report of employee benefit plan (Form 5500)	YYYYForm5500 Plan Name Merged, "Plan Name Merged" is abbreviated version of the plan name for the plan merged into this plan.
56.	Addendum A for Certain Events Section B, Item (5)	In addition to the information provided with Checklist Items #7.a., #7.b., and #7.c., does the application include similar certifications of plan status for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)?	Yes No			N/A	Identify how many zone certifications are provided.	Zone certification	YYYYZoneYYYYMMDD Plan Name Merged, where the first "YYYY" is the applicable plan year, and "YYYYMMDD" is the date the certification was prepared. "Plan Name Merged" is an abbreviated version of the plan name for the plan merged into this plan.
57.	Addendum A for Certain Events Section B, Item (6)	In addition to the information provided with Checklist Item #8, does the application include the most recent cash and investment account statements for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)?	Yes No			N/A		Bank/Asset statements for all cash and investment accounts	N/A
58.	Addendum A for Certain Events Section B, Item (7)	In addition to the information provided with Checklist Item #9, does the application include the most recent plan financial statement (audited, or unaudited if audited is not available) for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)?	Yes No			N/A		Plan's most recent financial statement (audited, or unaudited if audited not available)	N/A
59.	Addendum A for Certain Events Section B, Item (8)	In addition to the information provided with Checklist Item #10, does the application include all of the written policies and procedures governing the plan's determination, assessment, collection, settlement, and payment of withdrawal liability for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)? Are all such items included in a single document using the required filenaming convention?	Yes No			N/A		Pension plan documents, all versions available, and all amendments signed and dated	WDL Plan Name Merged, where "Plan Name Merged" is an abbreviated version of the plan name for the plan merged into this plan.

Application to PBGC for Approval of Special Financial Assistance (SFA)

v20230727

APPLICATION CHECKLIST

Plan name:	Bakery and Confectionery Union and Industry International Pension Fund
EIN:	52-6118572
PN:	001
SFA Amount Requested:	\$3,199,389,088.00

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 YYYY = plan year
 Plan Name = abbreviated plan name

Your application will be considered incomplete if No is entered as a Plan Response for any of Checklist Items #1 through #39. In addition, if required to provide information due to a "certain event" (see Addendum A of the SFA Filing Instructions), your application will be considered incomplete if No is entered as a Plan Response for any Checklist Items #40.a. through #49.b. If there is a merger event described in Addendum A, your application will also be considered incomplete if No is entered as a Plan Response for any Checklist Items #50 through #63.

Explain all N/A responses. Provide comments where noted. Also add any other optional explanatory comments.

Checklist Item #	SFA Filing Instructions Reference		Response Options	Plan Response	Name of File(s) Uploaded	Page Number Reference(s)	Plan Comments	In the e-Filing Portal, upload as Document Type	Use this Filenaming Convention
60.	Addendum A for Certain Events Section B, Item (9)	In addition to the information provided with Checklist Item #11, does the application include documentation of a death audit (with the information described in Checklist Item #11) for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)?	Yes No					Pension plan documents, all versions available, and all amendments signed and dated	<i>Death Audit Plan Name Merged</i> , where "Plan Name Merged" is an abbreviated version of the plan name for the plan merged into this plan.
61.	Addendum A for Certain Events Section C, Item (1)	In addition to the information provided with Checklist Item #13, does the application include the same information in the format of Template 1 for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)? Enter N/A if each plan that fully merged into this plan is not required to respond Yes to line 8b(1) on the most recently filed Form 5500 Schedule MB.	Yes No N/A					Financial assistance spreadsheet (template)	<i>Template 1 Plan Name Merged</i> , where "Plan Name Merged" is an abbreviated version of the plan name for the plan merged into this plan.
62.	Addendum A for Certain Events Section C, Item (2)	In addition to the information provided with Checklist Item #14, does the application include the same information in the format of Template 2 (if required based on the participant threshold) for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)(ii)? Enter N/A if each plan that merged into this plan has less than 10,000 participants on line 6f of the most recently filed Form 5500.	Yes No N/A					Contributing employers	<i>Template 2 Plan Name Merged</i> , where "Plan Name Merged" is an abbreviated version of the plan name for the plan merged into this plan.
63.	Addendum A for Certain Events Section C, Item (3)	In addition to the information provided with Checklist Item #15, does the application include similar information in the format of Template 3 for each plan that merged into this plan due to a merger described in § 4262.4(f)(1)?	Yes No					Historical Plan Financial Information (CBUs, contribution rates, contribution amounts, withdrawal liability payments)	<i>Template 3 Plan Name Merged</i> , where "Plan Name Merged" is an abbreviated version of the plan name for the plan merged into this plan.

	Active	Inactive Vested	Retiree	Beneficiary	Deferred Beneficiary
January 1, 2021 Valuation Report Counts	15,533	32,654	48,077	8,149	211
Deaths indentified prior to initial application	-7	-147	-179	-3	9
Confirmed beneficiaries from deaths identified prior to initial application				35	
Change in inactive vested inclusion (including those up to age 85)			99		
Deaths from independent death audits with unknown marital status	-16	-369			
Deaths from independent death audits with no beneficiary				-253	-2
Deaths from independent death audits with known beneficiaries not deceased			-2	-19	
Counts for SFA Application	15,510	32,235	47,626	8,100	218

Notes:

1. The benefit payments resulting from independent death audits from the PBGC remain categorized with original participant status from January 1, 2021 valuation
2. One death from the independent death audit was both a retiree and beneficiary in the plan

Version Updates

Version	Date updated
v20220701p	07/01/2022

Contributing Employers

For additional submission due to merger under § 4262.4(f)(1)(ii): *Template 2 Plan Name Merged*, where "Plan Name Merged" is an abbreviated version of the plan name for the separate plan involved in the merger.

If the plan has 10,000 or more participants, as required to be entered on line 6f of the plan’s most recently filed Form 5500 (by the filing date of the initial application), enter a listing of the 15 contributing employers with the largest contribution amounts and the amount of contributions paid by each employer during the most recently completed plan year. For example, if a calendar year plan filed an application on April 1, 2023, the plan would look to line 6f of the 2021 Form 5500 filed in 2022. If the line 6f of the 2021 Form 5500 showed 10,000 or more participants, the plan must list the 15 contributing employers with the largest contributions and the contributions made by each employer during 2022 without regard to whether a contribution was made on account of a year other than 2022. Alternatively, the plan may choose to provide the listing of the 15 largest contributing employers and the amounts of contributions paid by each of these employers on account of the most recently completed plan year. Identify the basis (cash or accrual) used to report the employer contributions.

If the plan is required to provide this information, it is required for the Top 15 employers even if the employer’s contribution is less than 5% of total contributions.

PLAN INFORMATION

Abbreviated Plan Name:	BCPEN	
EIN:	52-6118572	
PN:	001	

Most Recently Completed Plan Year:	2022
Contribution Basis:	Accrual

Cash or Accrual

List in order with employer with largest contribution amount first

Order	Contributions	Contributing Employer
1	\$45,184,118	BIMBO BAKERIES USA
2	\$18,267,176	ALBERTSON'S COMPANIES
3	\$12,595,572	UNITED STATES BAKERY
4	\$9,044,810	THE KROGER CO
5	\$8,553,176	ALPHA BAKING CO
6	\$5,273,363	LEWIS BROTHERS BAKERIES INC
7	\$4,229,746	KELLOGG COMPANY
8	\$3,614,548	RICH PRODUCTS CORP
9	\$3,574,244	SEES CANDIES INC
10	\$3,506,299	TOOTSIE ROLL IND INC
11	\$2,355,861	J M SMUCKER COMPANY
12	\$1,823,291	TREEHOUSE FOODS
13	\$1,567,423	HILLSHIRE BRANDS COMPANY
14	\$1,457,994	GONNELLA BAKING CO INC
15	\$1,378,062	SCHMIDT BAKING CO INC

v20230727p

Version Updates

Version	Date updated	
v20230727p	07/27/2023	Updated to highlight explanation needed if contributions and withdrawal liability payments do not match the plan year 5500 amounts.
v20220701p	07/01/2022	

TEMPLATE 3

Historical Plan Information

File name: *Template 3 Plan Name*, where "Plan Name" is an abbreviated version of the plan name.

v20230727p

For additional submission due to merger under § 4262.4(f)(1)(ii): *Template 3 Plan Name Merged*, where "Plan Name Merged" is an abbreviated version of the plan name for the separate plan involved in the merger.

Provide historical plan information for the 2010 plan year through the plan year immediately preceding the date the plan's initial application was filed that separately identifies: total contributions, total contribution base units (including identification of the base unit used (i.e., hourly, weekly)), average contribution rates, and number of active participants at the beginning of each plan year. Also show separately for each of the plan years in the same period all other sources of non-investment income, including, if applicable, withdrawal liability payments collected, reciprocity contributions (if applicable), additional contributions from the rehabilitation plan (if any), and other identifiable contribution streams.

If the contributions and withdrawal liabilities shown on this table do not equal the amount shown as credited to the funding standard account on the plan year Schedule MB of Form 5500, include an explanation as a footnote to this table.

PLAN INFORMATION

Abbreviated Plan Name:	BCPEN
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EIN:	52-6118572
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PN:	001
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Unit (e.g. hourly, weekly)	Hours
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All Other Sources of Non-Investment Income

Plan Year (in order from oldest to most recent)	Plan Year Start Date	Plan Year End Date	Total Contributions* **	Total Contribution Base Units	Average Contribution Rate	Reciprocity Contributions (if applicable)	Additional Rehab Plan Contributions (if applicable)	Other - Explain if Applicable	Withdrawal Liability Payments Collected**	Number of Active Participants at Beginning of Plan Year
2010	01/01/2010	12/31/2010	\$181,342,606	67,997,437	\$2.67				\$36,594,167.00	33,807
2011	01/01/2011	12/31/2011	\$162,365,732	65,545,835	\$2.48				\$6,532,129.00	32,449
2012	01/01/2012	12/31/2012	\$140,844,524	50,958,887	\$2.76				\$2,264,508.00	25,480
2013	01/01/2013	12/31/2013	\$152,050,617	49,993,487	\$3.04				\$3,281,958.00	24,241
2014	01/01/2014	12/31/2014	\$151,339,894	49,001,973	\$3.09				\$6,090,859.00	23,381
2015	01/01/2015	12/31/2015	\$155,691,448	48,276,947	\$3.22				\$3,785,288.00	22,769
2016	01/01/2016	12/31/2016	\$151,673,587	45,143,268	\$3.36				\$5,524,894.00	22,340
2017	01/01/2017	12/31/2017	\$157,322,019	44,067,835	\$3.57				\$7,868,377.00	20,621
2018	01/01/2018	12/31/2018	\$145,163,703	40,056,522	\$3.62				\$70,033,181.00	19,949
2019	01/01/2019	12/31/2019	\$138,201,226	35,462,053	\$3.90				\$20,306,215.00	17,186
2020	01/01/2020	12/31/2020	\$136,214,127	33,368,005	\$4.08				\$76,034,762.00	16,489
2021	01/01/2021	12/31/2021	\$137,789,954	32,989,263	\$4.18				\$80,486,219.00	15,533
2022	01/01/2022	12/31/2022	\$141,036,657	33,615,309	\$4.20				\$32,234,728.00	14,787

* Total contributions shown here should be contributions based upon CBU's and should not include items separately shown in any columns under "All Other Sources of Non-Investment Income."

** If the contributions and withdrawal liabilities shown on this table do not equal the amounts shown as credited to the funding standard account on the plan year Schedule MB of Form 5500, include an explanation as a footnote to this table.

TEMPLATE 4A

v20221102p

SFA Determination - under the "basic method" for all plans, and under the "increasing assets method" for MPRA plans

File name: *Template 4A Plan Name*, where "Plan Name" is an abbreviated version of the plan name.

If submitting additional information due to a merger under § 4262.4(f)(1)(ii): *Template 4A Plan Name Merged*, where "Plan Name Merged" is an abbreviated version of the plan name for the separate plan involved in the merger.

If submitting additional information due to certain events with limitations under § 4262.4(f)(1)(i): *Template 4A Plan Name Add*, where "Plan Name" is an abbreviated version of the plan name.

If submitting a supplemented application under § 4262.4(g)(6): *Template 4A Supp Plan Name*, where "Plan Name" is an abbreviated version of the plan name.

Instructions for Section C, Item (4) of the Instructions for Filing Requirements for Multiemployer Plans Applying for Special Financial Assistance:

IFR filers submitting a supplemented application should see Addendum C for more information.

MPRA plans using the "increasing assets method" should see Addendum D for more information.

For all plans, provide information used to determine the amount of SFA under the "basic method" described in § 4262.4(a)(1).

For MPRA plans, also provide information used to determine the amount of SFA under the "increasing assets method" described in § 4262.4(a)(2)(i).

The information to be provided is:

NOTE: All items below are provided on Sheet '4A-4 SFA Details .4(a)(1)' unless otherwise indicated.

- a. The amount of SFA calculated using the "basic method", determined as a lump sum as of the SFA measurement date.
- b. Non-SFA interest rate required under § 4262.4(e)(1) of PBGC's SFA regulation, including supporting details on how it was determined.
[Sheet: 4A-1 Interest Rates]
- c. SFA interest rate required under § 4262.4(e)(2) of PBGC's SFA regulation, including supporting details on how it was determined.
[Sheet: 4A-1 Interest Rates]
- d. Fair market value of assets as of the SFA measurement date. This amount should include any assets at the SFA measurement date attributable to financial assistance received by the plan under section 4261 of ERISA, but should not reflect a payable for amounts owed to PBGC for all amounts of such financial assistance received by the plan.

- e. For each plan year in the period beginning on the SFA measurement date and ending on the last day of the last plan year ending in 2051 (the "SFA coverage period"):
- i. Separately identify the projected amount of contributions, projected withdrawal liability payments reflecting a reasonable allowance for amounts considered uncollectible, and other payments expected to be made to the plan (excluding the amount of financial assistance under section 4261 of ERISA and SFA to be received by the plan).
 - ii. Identify the benefit payments described in § 4262.4(b)(1) (including any benefits that were restored under 26 CFR 1.432(e)(9)-(1)(e)(3) and excluding the payments in e.iii. below), separately for current retirees and beneficiaries, current terminated vested participants not yet in pay status, current active participants, and new entrants.
[Sheet: 4A-2 SFA Ben Pmts]

Identify total benefit payments paid and expected to be paid from projected SFA assets separately from total benefit payments paid and expected to be paid from non-SFA assets after the projected SFA assets are fully exhausted.
 - iii. Separately identify the make-up payments described in § 4262.4(b)(1) attributable to the reinstatement of benefits under § 4262.15 that were previously suspended through the SFA measurement date.
[Also see applicable examples in Section C, Item (4)e.iii. of the SFA instructions.]
 - iv. Separately identify administrative expenses paid and expected to be paid (excluding the amount owed PBGC under section 4261 of ERISA) for premiums to PBGC and for all other administrative expenses.
[Sheet: 4A-3 SFA Pcount and Admin Exp]

Identify total administrative expenses paid and expected to be paid from projected SFA assets separately from total administrative expenses paid and expected to be paid from non-SFA assets after the projected SFA assets are fully exhausted.
 - v. Provide the projected total participant count at the beginning of each year.
[Sheet: 4A-3 SFA Pcount and Admin Exp]
 - vi. Provide the projected investment income earned by assets not attributable to SFA based on the non-SFA interest rate in b. above and the projected fair market value of non-SFA assets at the end of each plan year.
 - vii. Provide the projected investment income earned by assets attributable to SFA based on the SFA interest rate in c. above (excluding investment returns for the plan year in which the sum of annual projected benefit payments and administrative expenses for the year exceeds the beginning-of-year projected SFA assets) and the projected fair market value of SFA assets at the end of each plan year.
- f. The projected SFA exhaustion year. This is the first day of the plan year in which the sum of annual projected benefit payments and administrative expenses for the year exceeds the beginning-of-year projected SFA assets. Note this date is only required for the calculation method under which the requested amount of SFA is determined.

Additional instructions for each individual worksheet:

Sheet

4A-1 SFA Determination - non-SFA Interest Rate and SFA Interest Rate

See instructions on 4A-1 Interest Rates.

4A-2 SFA Determination - Benefit Payments for the "basic method" for all plans, and for the "increasing assets method" for MRPA plans

This sheet is not required for an IFR filer submitting a supplemented application under § 4262.4(g)(6) if the total projected benefit payments are the same as those used in the application approved under the interim final rule.

On this sheet, you will provide:

- Basic plan information (plan name, EIN/PN, SFA measurement date), and
- Year-by-year deterministic projection of benefit payments.

For each plan year in the period beginning on the SFA measurement date and ending on the last day of the last plan year ending in 2051 (the "SFA coverage period"), identify benefit payments described in § 4262.4(b)(1) for current retirees and beneficiaries, current terminated vested participants not yet in pay status, currently active participants, and new entrants. Projected benefit payments should be entered based on current participant status as of the SFA census date. On this Sheet 4A-2, show all benefit payments as positive amounts.

If the plan has suspended benefit payments under sections 305(e)(9) or 4245(a) of ERISA, the benefit payments in this Sheet 4A-2 projection should reflect prospective reinstatement of benefits assuming such reinstatements commence as of the SFA measurement date. If the plan restored or partially restored benefits under 26 CFR 1.432(e)(9)-1(e)(3) before the SFA measurement date, the benefit payments in this Sheet 4A-2 should reflect fully restored prospective benefits.

Make-up payments to be paid to restore previously suspended benefits should not be included in this Sheet 4A-2, and are separately shown in Sheet 4A-4.

Except for the first row in the projection exhibit, each row must include the full plan year of the indicated information up to the plan year ending in 2051. The first row in the projection period is for the period beginning on the SFA measurement date and ending on the last day of the plan year containing the SFA measurement date, so the first row may contain less than a full plan year of information. For all other periods, provide the full plan year of information up to the plan year ending in 2051.

4A-3 SFA Determination - Participant Count and Administrative Expenses for the "basic method" for all plans, and for the "increasing assets method" for MPRA plans

This sheet is not required for an IFR filer submitting a supplemented application under § 4262.4(g)(6).

On this sheet, you will provide:

- Basic plan information (plan name, EIN/PN, SFA measurement date), and
- Year-by-year deterministic projection of participant count and administrative expenses.

For each plan year in the period beginning on the SFA measurement date and ending on the last day of the last plan year ending in 2051 (the "SFA coverage period"), identify the projected total participant count at the beginning of each year, as well as administrative expenses, separately for premiums to PBGC and for all other administrative expenses. On this Sheet 4A-3, show all administrative expenses as positive amounts. Total expenses should match the amounts shown on 4A-4 and 4A-5.

Any amounts owed to PBGC for financial assistance under section 4261 of ERISA should not be included in this Sheet 4A-3.

Except for the first row in the projection exhibit, each row must include the full plan year of the indicated information up to the plan year ending in 2051. The first row in the projection period is for the period beginning on the SFA measurement date and ending on the last day of the plan year containing the SFA measurement date, so the first row may contain less than a full plan year of information. For all other periods, provide the full plan year of information up to the plan year ending in 2051.

4A-4 SFA Determination - Details for the "basic method" under § 4262.4(a)(1) for all plans

On this sheet, you will provide:

- Basic plan information (plan name, EIN/PN, SFA measurement date, non-SFA interest rate, SFA interest rate),
- MPRA plan status and, if applicable, certain MPRA information,
- Fair Market Value of Assets as of the SFA measurement date,
- SFA Amount as of the SFA measurement date calculated under the "basic method",
- Projected SFA exhaustion year (only if the requested amount of SFA is determined under the "basic method"), and
- Year-by-year deterministic projection.

For each plan year in the period beginning on the SFA measurement date and ending on the last day of the last plan year ending in 2051 (the "SFA coverage period"), provide each of the items requested in Columns (1) through (12). Show payments INTO the plan as positive amounts and payments OUT of the plan as negative amounts.

If the plan has suspended benefit payments under sections 305(e)(9) or 4245(a) of ERISA, Column (5) should show the make-up payments to be paid to restore the previously suspended benefits. These amounts should be determined as if such make-up payments are paid beginning as of the SFA measurement date. If the plan sponsor elects to pay these amounts as a lump sum, then the lump sum amount is assumed paid as of the SFA measurement date. If the plan sponsor elects to pay equal installments over 60 months, the first monthly payment is assumed paid on the first regular payment date on or after the SFA measurement date. See the examples in the SFA Instructions. If the make-up payments are paid over 60 months, each row in the projection should reflect the monthly payments for that period. The prospective reinstatement of suspended benefits is included in Column (4); Column (5) is only for make-up payments for past benefits that were suspended.

Except for the first row in the projection exhibit, each row must include the full plan year of the indicated information up to the plan year ending in 2051. The first row in the projection period is for the period beginning on the SFA measurement date and ending on the last day of the plan year containing the SFA measurement date, so the first row may contain less than a full plan year of information. For all other periods, provide the full plan year of information up to the plan year ending in 2051.

4A-5 SFA Determination - Details for the "increasing assets method" under § 4262.4(a)(2)(i) for MPRA plans

This sheet is to only be used by MPRA plans. For such plans, this sheet should be completed in addition to Sheet 4A-4.

On this sheet, you will provide:

- Basic plan information (plan name, EIN/PN, SFA measurement date, non-SFA interest rate, SFA interest rate),
- MPRA plan status, and if applicable, certain MPRA information,
- Fair Market Value of Assets as of the SFA measurement date,
- SFA Amount as of the SFA measurement date calculated under the "increasing assets method",
- Projected SFA exhaustion year (only if the requested amount of SFA is determined under the "increasing assets method"), and
- Year-by-year deterministic projection.

This sheet is identical to Sheet 4A-4, and the information in Columns (1) through (6) should be the same as that used in the "basic method" calculation in Sheet 4A-4. The SFA Amount as of the SFA Measurement Date will differ from that calculated in Sheet 4A-4, as it will be calculated in accordance with § 4262.4(a)(2)(i) as the lowest whole dollar amount (not less than \$0) for which, as of the last day of each plan year during the SFA coverage period, projected SFA assets and projected non-SFA assets are both greater than or equal to zero, and, as of the last day of the SFA coverage period, the sum of projected SFA assets and projected non-SFA assets is greater than the amount of such sum as of the last day of the immediately preceding plan year.

Version Updates (newest version at top)

Version	Date updated	
v20221102p	11/02/2022	Added clarifying instructions for 4A-2 and 4A-3
v20220802p	08/02/2022	Cosmetic changes to increase the size of some rows
v20220701p	07/01/2022	

SFA Determination - non-SFA Interest Rate and SFA Interest Rate

Provide the non-SFA interest rate and SFA interest rate used, including supporting details on how they were determined.

PLAN INFORMATION

Abbreviated Plan Name:	BCPEN
EIN:	52-6118572
PN:	001
Initial Application Date:	03/01/2023
SFA Measurement Date:	12/31/2022
Last day of first plan year ending after the measurement date:	12/31/2023

For a plan other than a plan described in § 4262.4(g) (i.e., for a plan that has not filed an initial application under PBGC's interim final rule), the last day of the third calendar month immediately preceding the plan's initial application date.
 For a plan described in § 4262.4(g) (i.e., for a plan that filed an initial application prior to publication of the final rule), the last day of the calendar quarter immediately preceding the plan's initial application date.

Non-SFA Interest Rate Used:	5.85%	Rate used in projection of non-SFA assets.
SFA Interest Rate Used:	3.77%	Rate used in projection of SFA assets.

Development of non-SFA interest rate and SFA interest rate:

Plan Interest Rate:	6.50%	Interest rate used for the funding standard account projections in the plan's most recently completed certification of plan status before 1/1/2021.
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Corresponding ERISA Section 303(h)(2)(C)(i), (ii), and (iii) rates disregarding modifications made under clause (iv) of such section.

	Month Year	Corresponding ERISA Section 303(h)(2)(C)(i), (ii), and (iii) rates disregarding modifications made under clause (iv) of such section.		
		(i)	(ii)	(iii)
Month in which plan's initial application is filed, and corresponding segment rates (leave (i), (ii), and (iii) blank if the IRS Notice for this month has not yet been issued):	March 2023			
1 month preceding month in which plan's initial application is filed, and corresponding segment rates:	February 2023	2.31%	3.72%	4.00%
2 months preceding month in which plan's initial application is filed, and corresponding segment rates:	January 2023	2.13%	3.62%	3.93%
3 months preceding month in which plan's initial application is filed, and corresponding segment rates:	December 2022	1.95%	3.50%	3.85%

24-month average segment rates without regard to interest rate stabilization rules. These rates are issued by IRS each month. For example, the applicable segment rates for August 2021 are 1.13%, 2.70%, and 3.38%. Those rates were issued in [IRS Notice 21-50](#) on August 16, 2021 (see page 2 of notice under the heading "24-Month Average Segment Rates Without 25-Year Average Adjustment").
 They are also available on IRS' [Funding Yield Curve Segment Rate Tables](#) web page (See Funding Table 3 under the heading "24-Month Average Segment Rates Not Adjusted").

Non-SFA Interest Rate Limit (lowest 3rd segment rate plus 200 basis points):	5.85%	This amount is calculated based on the other information entered above.
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Non-SFA Interest Rate Calculation (lesser of Plan Interest Rate and Non-SFA Interest Rate Limit):	5.85%	This amount is calculated based on the other information entered above.
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Non-SFA Interest Rate Match Check:	Match	If the non-SFA Interest Rate Calculation is not equal to the non-SFA Interest Rate Used, provide explanation below.
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SFA Interest Rate Limit (lowest average of the 3 segment rates plus 67 basis points):	3.77%	This amount is calculated based on the other information entered.
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SFA Interest Rate Calculation (lesser of Plan Interest Rate and SFA Interest Rate Limit):	3.77%	This amount is calculated based on the other information entered above.
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SFA Interest Rate Match Check:	Match	If the SFA Interest Rate Calculation is not equal to the SFA Interest Rate Used, provide explanation below.
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TEMPLATE 4A - Sheet 4A-2

v20221102p

SFA Determination - Benefit Payments for the "basic method" for all plans, and for the "increasing assets method" for MRPA plans

See Template 4A Instructions for Additional Instructions for Sheet 4A-2.

PLAN INFORMATION

Abbreviated Plan Name:	BCPEN	
EIN:	52-6118572	
PN:	001	
SFA Measurement Date:	12/31/2022	

On this Sheet, show all benefit payment amounts as positive amounts.

PROJECTED BENEFIT PAYMENTS for:

SFA Measurement Date / Plan Year Start Date		Plan Year End Date	Current Retirees and Beneficiaries in Pay Status	Current Terminated Vested Participants	Current Active Participants	New Entrants	Total
12/31/2022	12/31/2023		\$565,143,140	\$33,883,518	\$34,672,700	\$0	\$633,699,358
01/01/2024	12/31/2024		\$547,253,067	\$37,551,239	\$43,029,118	\$0	\$627,833,424
01/01/2025	12/31/2025		\$528,973,247	\$45,728,301	\$50,864,581	\$0	\$625,566,129
01/01/2026	12/31/2026		\$510,308,478	\$53,034,860	\$58,178,050	\$290,118	\$621,811,506
01/01/2027	12/31/2027		\$491,133,581	\$61,016,446	\$64,997,491	\$434,045	\$617,581,563
01/01/2028	12/31/2028		\$471,622,693	\$67,196,595	\$71,255,211	\$562,767	\$610,637,266
01/01/2029	12/31/2029		\$451,698,836	\$73,804,836	\$77,261,039	\$677,829	\$603,442,540
01/01/2030	12/31/2030		\$431,458,907	\$80,342,463	\$82,495,531	\$1,454,048	\$595,750,949
01/01/2031	12/31/2031		\$410,995,728	\$86,665,343	\$87,276,147	\$1,934,596	\$586,871,814
01/01/2032	12/31/2032		\$390,343,365	\$92,644,981	\$91,612,552	\$2,306,997	\$576,907,895
01/01/2033	12/31/2033		\$369,527,019	\$97,781,833	\$95,552,391	\$2,630,253	\$565,491,496
01/01/2034	12/31/2034		\$348,583,497	\$102,723,036	\$99,232,829	\$2,929,790	\$553,469,152
01/01/2035	12/31/2035		\$327,608,271	\$107,235,314	\$102,309,702	\$4,276,907	\$541,430,194
01/01/2036	12/31/2036		\$306,678,017	\$113,074,813	\$104,964,883	\$5,467,504	\$530,185,217
01/01/2037	12/31/2037		\$285,883,450	\$119,612,576	\$107,045,760	\$6,568,300	\$519,110,086
01/01/2038	12/31/2038		\$265,301,752	\$122,197,713	\$108,626,901	\$7,751,104	\$503,877,470
01/01/2039	12/31/2039		\$245,031,737	\$124,715,074	\$109,989,284	\$8,959,436	\$488,695,531
01/01/2040	12/31/2040		\$225,154,978	\$127,884,764	\$110,969,839	\$10,759,050	\$474,768,631
01/01/2041	12/31/2041		\$205,781,586	\$128,551,297	\$111,680,571	\$12,224,302	\$458,237,756
01/01/2042	12/31/2042		\$187,002,630	\$127,925,416	\$112,077,390	\$13,785,275	\$440,790,711
01/01/2043	12/31/2043		\$168,917,302	\$128,603,476	\$112,201,713	\$15,379,325	\$425,101,816
01/01/2044	12/31/2044		\$151,612,717	\$127,313,701	\$112,017,091	\$16,976,661	\$407,920,170
01/01/2045	12/31/2045		\$135,177,144	\$125,655,666	\$111,431,187	\$19,197,133	\$391,461,130
01/01/2046	12/31/2046		\$119,687,054	\$123,277,821	\$110,629,675	\$20,996,607	\$374,591,157
01/01/2047	12/31/2047		\$105,207,267	\$120,896,374	\$109,486,497	\$22,935,838	\$358,525,976
01/01/2048	12/31/2048		\$91,788,139	\$116,191,621	\$108,055,540	\$24,957,786	\$340,993,086
01/01/2049	12/31/2049		\$79,463,678	\$112,669,914	\$106,365,665	\$27,015,282	\$325,514,539
01/01/2050	12/31/2050		\$68,250,089	\$109,070,924	\$104,235,424	\$29,785,994	\$311,342,431
01/01/2051	12/31/2051		\$58,145,040	\$104,704,313	\$101,793,045	\$32,006,855	\$296,649,253

TEMPLATE 4A - Sheet 4A-3

v20221102p

SFA Determination - Participant Count and Administrative Expenses for the "basic method" for all plans, and for the "increasing assets method" for MPRA plans

See Template 4A Instructions for Additional Instructions for Sheet 4A-3.

PLAN INFORMATION

Abbreviated Plan Name:	BCPEN	
EIN:	52-6118572	
PN:	001	
SFA Measurement Date:	12/31/2022	

On this Sheet, show all administrative expense amounts as positive amounts.

SFA Measurement Date / Plan Year Start Date		Plan Year End Date	Total Participant Count at Beginning of Plan Year	PROJECTED ADMINISTRATIVE EXPENSES for:		
				PBGC Premiums	Other	Total
12/31/2022	12/31/2023		104,558	\$3,659,530	\$12,317,975	\$15,977,505
01/01/2024	12/31/2024		103,195	\$3,818,215	\$10,505,836	\$14,324,051
01/01/2025	12/31/2025		101,612	\$3,853,635	\$10,746,517	\$14,600,152
01/01/2026	12/31/2026		100,070	\$3,890,034	\$11,075,122	\$14,965,156
01/01/2027	12/31/2027		98,546	\$3,926,561	\$11,412,724	\$15,339,285
01/01/2028	12/31/2028		96,983	\$3,960,890	\$11,761,877	\$15,722,767
01/01/2029	12/31/2029		95,225	\$3,986,319	\$12,129,517	\$16,115,836
01/01/2030	12/31/2030		93,442	\$4,009,471	\$12,509,261	\$16,518,732
01/01/2031	12/31/2031		91,659	\$4,766,268	\$12,900,412	\$17,666,680
01/01/2032	12/31/2032		89,816	\$4,787,193	\$13,321,154	\$18,108,347
01/01/2033	12/31/2033		88,024	\$4,808,971	\$13,752,084	\$18,561,055
01/01/2034	12/31/2034		86,202	\$4,827,167	\$14,197,915	\$19,025,082
01/01/2035	12/31/2035		84,299	\$4,838,617	\$14,662,092	\$19,500,709
01/01/2036	12/31/2036		82,440	\$4,850,211	\$15,138,015	\$19,988,226
01/01/2037	12/31/2037		80,398	\$4,848,326	\$15,639,606	\$20,487,932
01/01/2038	12/31/2038		78,349	\$4,842,882	\$16,157,249	\$21,000,130
01/01/2039	12/31/2039		76,248	\$4,830,841	\$16,694,293	\$21,525,134
01/01/2040	12/31/2040		74,141	\$4,814,781	\$17,248,481	\$22,063,262
01/01/2041	12/31/2041		71,941	\$4,788,709	\$17,826,134	\$22,614,844
01/01/2042	12/31/2042		69,752	\$4,759,075	\$18,421,140	\$23,180,215
01/01/2043	12/31/2043		67,551	\$4,724,126	\$19,035,594	\$23,759,720
01/01/2044	12/31/2044		65,374	\$4,686,177	\$19,667,536	\$24,353,713
01/01/2045	12/31/2045		63,129	\$4,638,380	\$18,849,287	\$23,487,668
01/01/2046	12/31/2046		60,925	\$4,588,353	\$17,887,116	\$22,475,469
01/01/2047	12/31/2047		58,737	\$4,534,161	\$16,977,397	\$21,511,559
01/01/2048	12/31/2048		56,603	\$4,478,664	\$15,980,921	\$20,459,585
01/01/2049	12/31/2049		54,447	\$4,415,774	\$15,115,098	\$19,530,872
01/01/2050	12/31/2050		52,355	\$4,352,261	\$14,328,285	\$18,680,546
01/01/2051	12/31/2051		50,307	\$4,286,562	\$13,512,394	\$17,798,955

TEMPLATE 4A - Sheet 4A-4

SFA Determination - Details for the "basic method" under § 4262.4(a)(1) for all plans

See Template 4A Instructions for Additional Instructions for Sheet 4A-4.

PLAN INFORMATION

Abbreviated Plan Name:	BCPEN	
EIN:	52-6118572	
PN:	001	
MPRA Plan?	No	Meets the definition of a MPRA plan described in § 4262.4(a)(3)?
If a MPRA Plan, which method yields the greatest amount of SFA?	N/A	MPRA increasing assets method described in § 4262.4(a)(2)(i). MPRA present value method described in § 4262.4(a)(2)(ii).
SFA Measurement Date:	12/31/2022	
Fair Market Value of Assets as of the SFA Measurement Date:	\$3,169,023,667	
SFA Amount as of the SFA Measurement Date under the method calculated in this Sheet:	\$3,199,389,088	Per § 4262.4(a)(1), the lowest whole dollar amount (not less than \$0) for which, as of the last day of each plan year during the SFA coverage period, projected SFA assets and projected non-SFA assets are both greater than or equal to zero.
Projected SFA exhaustion year:	01/01/2028	Only required on this sheet if the requested amount of SFA is based on the "basic method". Plan Year Start Date of the plan year in which the sum of annual projected benefit payments and administrative expenses for the year exceeds the beginning-of-year projected SFA assets.
Non-SFA Interest Rate:	5.85%	
SFA Interest Rate:	3.77%	

On this Sheet, show payments INTO the plan as positive amounts, and payments OUT of the plan as negative amounts.

SFA Measurement Date / Plan Year Start Date		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
Plan Year End Date		Contributions	Withdrawal Liability Payments	Other Payments to Plan (excluding financial assistance and SFA)	Benefit Payments (should match total from Sheet 4A-2)	Make-up Payments Attributable to Reinstatement of Benefits Suspended through the SFA Measurement Date	Administrative Expenses (excluding amount owed PBGC under 4261 of ERISA; should match total from Sheet 4A-3)	Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from SFA Assets	SFA Investment Income Based on SFA Interest Rate	Projected SFA Assets at End of Plan Year (prior year assets + (7) + (8))	Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from Non-SFA Assets	Non-SFA Investment Income Based on Non-SFA Interest Rate	Projected Non-SFA Assets at End of Plan Year (prior year assets + (1) + (2) + (3) + (10) + (11))
12/31/2022	12/31/2023	\$128,776,199	\$31,096,536	\$0	-\$633,699,358	\$0	-\$15,977,505	-\$649,676,863	\$107,345,407	\$2,657,057,632	\$0	\$189,674,472	\$3,518,570,874
01/01/2024	12/31/2024	\$122,163,254	\$61,012,054	\$0	-\$627,833,424	\$0	-\$14,324,051	-\$642,157,475	\$87,102,683	\$2,102,002,840	\$0	\$210,747,784	\$3,912,493,966
01/01/2025	12/31/2025	\$115,905,773	\$50,141,697	\$0	-\$625,566,129	\$0	-\$14,600,152	-\$640,166,281	\$66,218,647	\$1,528,055,206	\$0	\$233,333,045	\$4,311,874,481
01/01/2026	12/31/2026	\$109,968,918	\$50,840,623	\$0	-\$621,811,506	\$0	-\$14,965,156	-\$636,776,662	\$44,651,187	\$935,929,731	\$0	\$256,556,363	\$4,729,240,385
01/01/2027	12/31/2027	\$104,373,153	\$51,545,696	\$0	-\$617,581,563	\$0	-\$15,339,285	-\$632,920,848	\$22,407,971	\$325,416,854	\$0	\$280,841,137	\$5,166,000,370
01/01/2028	12/31/2028	\$99,042,791	\$52,102,275	\$0	-\$610,637,266	\$0	-\$15,722,767	-\$325,416,854	\$0	\$0	-\$300,943,179	\$296,764,289	\$5,312,966,547
01/01/2029	12/31/2029	\$94,043,729	\$52,623,099	\$0	-\$603,442,540	\$0	-\$16,115,836	\$0	\$0	\$0	-\$619,558,376	\$295,187,356	\$5,135,262,354
01/01/2030	12/31/2030	\$89,303,603	\$53,065,220	\$0	-\$595,750,949	\$0	-\$16,518,732	\$0	\$0	\$0	-\$612,269,681	\$284,909,345	\$4,950,270,840
01/01/2031	12/31/2031	\$84,835,724	\$53,592,267	\$0	-\$586,871,814	\$0	-\$17,666,680	\$0	\$0	\$0	-\$604,538,494	\$274,232,256	\$4,758,392,594
01/01/2032	12/31/2032	\$80,656,485	\$53,988,656	\$0	-\$576,907,895	\$0	-\$18,108,347	\$0	\$0	\$0	-\$595,016,242	\$263,209,841	\$4,561,231,335
01/01/2033	12/31/2033	\$78,467,489	\$53,883,402	\$0	-\$565,491,496	\$0	-\$18,561,055	\$0	\$0	\$0	-\$584,052,551	\$251,964,011	\$4,361,493,686
01/01/2034	12/31/2034	\$76,445,091	\$44,194,658	\$0	-\$553,469,152	\$0	-\$19,025,082	\$0	\$0	\$0	-\$572,494,234	\$240,333,870	\$4,149,973,072
01/01/2035	12/31/2035	\$74,463,562	\$43,905,699	\$0	-\$541,430,194	\$0	-\$19,500,709	\$0	\$0	\$0	-\$560,930,903	\$228,267,768	\$3,935,679,199
01/01/2036	12/31/2036	\$72,542,502	\$42,870,545	\$0	-\$530,185,217	\$0	-\$19,988,226	\$0	\$0	\$0	-\$550,173,443	\$215,995,567	\$3,716,914,369
01/01/2037	12/31/2037	\$70,662,751	\$42,460,613	\$0	-\$519,110,086	\$0	-\$20,487,932	\$0	\$0	\$0	-\$539,598,018	\$203,473,977	\$3,493,913,692
01/01/2038	12/31/2038	\$68,874,154	\$42,460,613	\$0	-\$503,877,470	\$0	-\$21,000,130	\$0	\$0	\$0	-\$524,877,600	\$190,849,431	\$3,271,220,290
01/01/2039	12/31/2039	\$67,145,413	\$31,459,903	\$0	-\$488,695,531	\$0	-\$21,525,134	\$0	\$0	\$0	-\$510,220,665	\$177,947,560	\$3,037,552,501
01/01/2040	12/31/2040	\$65,461,394	\$16,055,755	\$0	-\$474,768,631	\$0	-\$22,063,262	\$0	\$0	\$0	-\$496,831,893	\$164,246,698	\$2,786,484,455
01/01/2041	12/31/2041	\$63,858,488	\$15,776,190	\$0	-\$458,237,756	\$0	-\$22,614,844	\$0	\$0	\$0	-\$480,852,600	\$150,017,776	\$2,535,284,310
01/01/2042	12/31/2042	\$62,301,529	\$14,653,172	\$0	-\$440,790,711	\$0	-\$23,180,215	\$0	\$0	\$0	-\$463,970,926	\$135,788,405	\$2,284,056,491
01/01/2043	12/31/2043	\$60,783,516	\$14,491,241	\$0	-\$425,101,816	\$0	-\$23,759,720	\$0	\$0	\$0	-\$448,861,536	\$121,528,138	\$2,031,997,849
01/01/2044	12/31/2044	\$59,297,826	\$11,548,731	\$0	-\$407,920,170	\$0	-\$24,353,713	\$0	\$0	\$0	-\$432,273,883	\$107,192,493	\$1,777,763,017
01/01/2045	12/31/2045	\$57,846,503	\$9,961,624	\$0	-\$391,461,130	\$0	-\$23,487,668	\$0	\$0	\$0	-\$414,948,798	\$92,783,054	\$1,523,405,401
01/01/2046	12/31/2046	\$56,451,019	\$8,459,829	\$0	-\$374,591,157	\$0	-\$22,475,469	\$0	\$0	\$0	-\$397,066,626	\$78,387,157	\$1,269,636,780
01/01/2047	12/31/2047	\$55,081,850	\$7,034,984	\$0	-\$358,525,976	\$0	-\$21,511,559	\$0	\$0	\$0	-\$380,037,535	\$64,001,689	\$1,015,717,768
01/01/2048	12/31/2048	\$53,756,098	\$5,692,000	\$0	-\$340,993,086	\$0	-\$20,459,585	\$0	\$0	\$0	-\$361,452,671	\$49,659,651	\$763,372,845
01/01/2049	12/31/2049	\$52,462,343	\$4,412,713	\$0	-\$325,514,539	\$0	-\$19,530,872	\$0	\$0	\$0	-\$345,045,411	\$35,343,860	\$510,546,351
01/01/2050	12/31/2050	\$51,199,905	\$3,212,938	\$0	-\$311,342,431	\$0	-\$18,680,546	\$0	\$0	\$0	-\$330,022,977	\$20,959,370	\$255,895,588
01/01/2051	12/31/2051	\$49,988,760	\$2,075,308	\$0	-\$296,649,253	\$0	-\$17,798,955	\$0	\$0	\$0	-\$314,448,208	\$6,488,552	\$0

SFA Determination - Details for the "increasing assets method" under § 4262.4(a)(2)(i) for MPRA plans

See Template 4A Instructions for Additional Instructions for Sheet 4A-5.

PLAN INFORMATION

Abbreviated Plan Name:	
EIN:	
PN:	
MPRA Plan?	Meets the definition of a MPRA plan described in § 4262.4(a)(3)?
If a MPRA Plan, which method yields the greatest amount of SFA?	MPRA increasing assets method described in § 4262.4(a)(2)(i). MPRA present value method described in § 4262.4(a)(2)(ii).
SFA Measurement Date:	
Fair Market Value of Assets as of the SFA Measurement Date:	
SFA Amount as of the SFA Measurement Date under the method calculated in this Sheet:	Per § 4262.4(a)(2)(i), the lowest whole dollar amount (not less than \$0) for which, as of the last day of each plan year during the SFA coverage period, projected SFA assets and projected non-SFA assets are both greater than or equal to zero, and, as of the last day of the SFA coverage period, the sum of projected SFA assets and projected non-SFA assets is greater than the amount of such sum as of the last day of the immediately preceding plan year.
Projected SFA exhaustion year:	Only required on this sheet if the requested amount of SFA is based on the "increasing assets method". Plan Year Start Date of the plan year in which the sum of annual projected benefit payments and administrative expenses for the year exceeds the beginning-of-year projected SFA assets.
Non-SFA Interest Rate:	
SFA Interest Rate:	

On this Sheet, show payments INTO the plan as positive amounts, and payments OUT of the plan as negative amounts.

		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
		Contributions	Withdrawal Liability Payments	Other Payments to Plan (excluding financial assistance and SFA)	Benefit Payments (should match total from Sheet 4A-2)	Make-up Payments Attributable to Reinstatement of Benefits Suspended through the SFA Measurement Date	Administrative Expenses (excluding amount owed PBGC under 4261 of ERISA; should match total from Sheet 4A-3)	Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from SFA Assets	SFA Investment Income Based on SFA Interest Rate	Projected SFA Assets at End of Plan Year (prior year assets + (7) + (8))	Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from Non-SFA Assets	Non-SFA Investment Income Based on Non-SFA Interest Rate	Projected Non-SFA Assets at End of Plan Year (prior year assets + (1) + (2) + (3) + (10) + (11))
SFA Measurement Date / Plan Year Start Date	Plan Year End Date												

TEMPLATE 6A

v20220802p

Reconciliation - for non-MPRA plans using the "basic method", or for MPRA plans for which the requested amount of SFA is determined under the "increasing assets method"

File name: *Template 6A Plan Name*, where "Plan Name" is an abbreviated version of the plan name.

Instructions for Section C, Item (6) of the Instructions for Filing Requirements for Multiemployer Plans Applying for Special Financial Assistance:

This Template 6A is not required if all assumptions and methods used to determine the requested SFA amount are identical to those used in the most recent actuarial certification of plan status completed before 1/1/2021 ("pre-2021 certification of plan status"), except the non-SFA and SFA interest rates, and except any assumptions changed in accordance with Section III, Acceptable Assumption Changes, in PBGC's SFA assumptions guidance (other than the acceptable assumption change for "missing" terminated vested participants described in Section III.E of PBGC's SFA assumptions guidance).

This Template 6A is also not required if the requested SFA amount from Template 4A is the same as the SFA amount shown in Template 5A (Baseline).

If the assumptions/methods used to determine the requested SFA amount differ from those in the "Baseline" projection in Template 5A, then provide a reconciliation of the change in the total amount of SFA due to each change in assumption/method from the Baseline to the requested SFA as shown in Template 4A.

For each assumption/method change from the Baseline through the requested SFA amount, provide a deterministic projection using the same calculation methodology used to determine the requested SFA amount, in the same format as Template 4A (either Sheet 4A-4 or Sheet 4A-5).

Additional instructions for each individual worksheet:

Sheet

6A-1 Reconciliation - Summary for the "basic method", or for MPRA plans for which the requested amount of SFA is determined under the "increasing assets method"

For Item number 1, show the SFA amount determined in Template 5A using the "Baseline" assumptions and methods. If there is only one change in assumptions/methods between the Baseline (Template 5A) and the requested SFA amount (Template 4A), then show on Item number 2 the requested SFA amount, and briefly identify the change in assumptions from the Baseline.

If there is more than one change in assumptions/methods from the Baseline, show each individual change as a separate Item number. Each Item number should reflect all changes already measured in the prior Item number. For example, the difference between the SFA amount shown for Item number 4 and Item number 5 should be the incremental change due to changing the identified single assumption/method. The Item numbers should show assumption/method changes in the order that they were incrementally measured.

6A-2 Reconciliation - Details for the "basic method" under § 4262.4(a)(1) for non-MPRA plans, or for the "increasing assets method" under § 4262.4(a)(2)(i) for MPRA plans for which the requested amount of SFA is determined under that method

For non-MPRA plans, see Template 4A instructions for Sheet 4A-4, except provide the projection used to determine the intermediate Item number 2 SFA amount from Sheet 6A-1 under the "basic method" described in § 4262.4(a)(1). Unlike Sheet 4A-4, it is not necessary to explicitly identify the projected SFA exhaustion year in Sheet 6A-2.

For MPRA plans for which the requested amount of SFA is determined under the "increasing assets method", see Template 4A instructions for Sheet 4A-5, except provide the projection used to determine each intermediate SFA amount from Sheet 6A-1 under the "increasing assets method" described in § 4262.4(a)(2)(i). Unlike Sheet 4A-5, it is not necessary to explicitly identify the projected SFA exhaustion year in Sheet 6A-2.

A Reconciliation Details sheet is not needed for the last Item number shown in the Sheet 6A-1 Reconciliation, since the information should be the same as shown in Template 4A. For example, if there is only one assumption change from the Baseline, then Item number 2 should identify what assumption changed between the Baseline and Item number 2, where Item number 2 is the requested SFA amount. Since details on the determination of the requested SFA amount are shown in Template 4A, a separate Sheet 6A-2 Reconciliation Details is not required here.

6A-3 Reconciliation - Details for the "basic method" under § 4262.4(a)(1) for non-MPRA plans, or for the "increasing assets method" under § 4262.4(a)(2)(i) for MPRA plans for which the requested amount of SFA is determined under that method

See instructions for 6A-2 Reconciliation Details, except for the intermediate Item number 3 SFA amount from Sheet 6A-1.

6A-4 Reconciliation - Details for the "basic method" under § 4262.4(a)(1) for non-MPRA plans, or for the "increasing assets method" under § 4262.4(a)(2)(i) for MPRA plans for which the requested amount of SFA is determined under that method

See instructions for 6A-2 Reconciliation Details, except for the intermediate Item number 4 SFA amount from Sheet 6A-1.

6A-5 Reconciliation - Details for the "basic method" under § 4262.4(a)(1) for non-MPRA plans, or for the "increasing assets method" under § 4262.4(a)(2)(i) for MPRA plans for which the requested amount of SFA is determined under that method

See instructions for 6A-2 Reconciliation Details, except for the intermediate Item number 5 SFA amount from Sheet 6A-1.

Version Updates (newest version at top)

Version	Date updated	
v20220802p	08/02/2022	Cosmetic changes to increase the size of some rows
v20220701p	07/01/2022	

TEMPLATE 6A - Sheet 6A-1

Reconciliation - Summary for the "basic method", or for MPRA plans for which the requested amount of SFA is determined under the "increasing assets method"

See Template 6A Instructions for Additional Instructions for Sheet 6A-1.

PLAN INFORMATION

Abbreviated Plan Name:	BCPEN
EIN:	52-6118572
PN:	001
MPRA Plan?	No
If a MPRA Plan, which method yields the greatest amount of SFA?	N/A

Item number	Basis for Assumptions/Methods. For each Item, briefly describe the incremental change reflected in the SFA amount.	Change in SFA Amount (from prior Item number)	SFA Amount	
1	Baseline	N/A	\$3,395,413,876	NOTE: A sheet with Recon Details is not required for the last Item number provided, since that information should be the same as provided in Template 4A. From Template 5A.
2	Change in Inactive Vested Inclusion (including those up to age 85)	\$5,680,797	\$3,401,094,673	Show details supporting the SFA amount on Sheet 6A-2.
3	Change Due to Death Audit	(\$13,625,450)	\$3,387,469,223	Show details supporting the SFA amount on Sheet 6A-3.
4	Change in Contraction to 4.6% for 10 years and 2.3% thereafter	\$75,318,716	\$3,462,787,939	Show details supporting the SFA amount on Sheet 6A-4.
5	Change in Collectible Withdrawal Liability Payments Made from Employers Assumed To Withdraw After the Measurement Date	(\$256,995,454)	\$3,205,792,485	Show details supporting the SFA amount on Sheet 6A-5.
6	Change in Administrative Expense Assumption	(\$6,403,397)	\$3,199,389,088	

Create additional rows as needed, and create additional detailed sheets by copying Sheet 6A-5 and re-labeling the header and the sheet name to be 6A-6, 6A-7, etc.

TEMPLATE 6A - Sheet 6A-2

Item Description (from 6A-1):	Change in Inactive Vested Inclusion (including those up to age 85)
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v2020802p

Reconciliation - Details for the "basic method" under § 4262.4(a)(1) for non-MPRA plans, or for the "increasing assets method" under § 4262.4(a)(2)(i) for MPRA plans for which the requested amount of SFA is determined under that method

See Template 4A instructions for Sheet 4A-4 or Sheet 4A-5, except provide the projection used to determine the intermediate SFA amount.

PLAN INFORMATION

Abbreviated Plan Name:	BCPEN
EIN:	52-6118572
PN:	001
MPRA Plan?	No
If a MPRA Plan, which method yields the greatest amount of SFA?	N/A
SFA Measurement Date:	12/31/2022
Fair Market Value of Assets as of the SFA Measurement Date:	\$3,169,023,667
SFA Amount as of the SFA Measurement Date under the method calculated in this Sheet:	\$3,401,094,673
Non-SFA Interest Rate:	5.85%
SFA Interest Rate:	3.77%

On this Sheet, show payments INTO the plan as positive amounts, and payments OUT of the plan as negative amounts.

SFA Measurement Date / Plan Year Start Date		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
Plan Year End Date		Contributions	Withdrawal Liability Payments	Other Payments to Plan (excluding financial assistance and SFA)	Benefit Payments	Make-up Payments Attributable to Reinstatement of Benefits Suspended through the SFA Measurement Date	Administrative Expenses (excluding amount owed PBGC under 4261 of ERISA)	Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from SFA Assets	SFA Investment Income Based on SFA Interest Rate	Projected SFA Assets at End of Plan Year (prior year assets + (7) + (8))	Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from Non-SFA Assets	Non-SFA Investment Income Based on Non-SFA Interest Rate	Projected Non-SFA Assets at End of Plan Year (prior year assets + (1) + (2) + (3) + (10) + (11))
12/31/2022	12/31/2023	\$118,076,882	\$31,096,536	\$0	-\$635,445,730	\$0	-\$14,349,568	-\$649,795,298	\$114,942,175	\$2,866,241,550	\$0	\$189,387,597	\$3,507,584,682
01/01/2024	12/31/2024	\$112,607,132	\$31,096,536	\$0	-\$629,466,233	\$0	-\$14,708,307	-\$644,174,540	\$94,948,934	\$2,317,015,944	\$0	\$209,046,759	\$3,860,335,109
01/01/2025	12/31/2025	\$107,414,588	\$31,063,602	\$0	-\$627,069,924	\$0	-\$15,076,015	-\$642,145,939	\$74,285,710	\$1,749,155,714	\$0	\$229,542,550	\$4,228,355,849
01/01/2026	12/31/2026	\$102,468,484	\$31,042,752	\$0	-\$623,041,763	\$0	-\$15,452,915	-\$638,494,678	\$52,953,125	\$1,163,614,161	\$0	\$250,938,587	\$4,612,805,672
01/01/2027	12/31/2027	\$97,795,659	\$31,028,358	\$0	-\$618,675,714	\$0	-\$15,839,238	-\$634,514,952	\$30,960,691	\$560,059,900	\$0	\$273,303,226	\$5,014,932,915
01/01/2028	12/31/2028	\$93,322,306	\$30,992,351	\$0	-\$611,611,518	\$0	-\$16,235,219	-\$560,059,900	\$0	\$0	-\$67,786,837	\$294,567,312	\$5,366,028,047
01/01/2029	12/31/2029	\$89,117,499	\$30,817,776	\$0	-\$604,316,585	\$0	-\$16,641,100	\$0	\$0	\$0	-\$620,957,685	\$297,532,934	\$5,162,538,572
01/01/2030	12/31/2030	\$85,114,499	\$30,788,979	\$0	-\$596,176,438	\$0	-\$17,057,127	\$0	\$0	\$0	-\$613,233,565	\$285,767,483	\$4,950,975,968
01/01/2031	12/31/2031	\$84,591,215	\$30,748,056	\$0	-\$587,108,815	\$0	-\$18,338,965	\$0	\$0	\$0	-\$605,447,780	\$273,628,904	\$4,734,496,364
01/01/2032	12/31/2032	\$84,175,550	\$30,671,101	\$0	-\$577,070,277	\$0	-\$18,797,439	\$0	\$0	\$0	-\$595,867,716	\$261,257,442	\$4,514,732,741
01/01/2033	12/31/2033	\$83,780,402	\$30,197,835	\$0	-\$565,588,479	\$0	-\$19,267,375	\$0	\$0	\$0	-\$584,855,854	\$248,729,215	\$4,292,584,339
01/01/2034	12/31/2034	\$83,511,739	\$29,703,417	\$0	-\$553,508,447	\$0	-\$19,749,060	\$0	\$0	\$0	-\$573,257,507	\$236,082,945	\$4,068,624,933
01/01/2035	12/31/2035	\$83,243,716	\$29,414,458	\$0	-\$540,889,599	\$0	-\$20,242,786	\$0	\$0	\$0	-\$561,132,385	\$223,353,007	\$3,843,503,729
01/01/2036	12/31/2036	\$82,996,870	\$28,379,304	\$0	-\$529,343,204	\$0	-\$20,748,856	\$0	\$0	\$0	-\$550,092,060	\$210,501,350	\$3,615,289,193
01/01/2037	12/31/2037	\$82,752,790	\$27,969,372	\$0	-\$518,093,573	\$0	-\$21,267,577	\$0	\$0	\$0	-\$539,361,150	\$197,475,829	\$3,384,126,034
01/01/2038	12/31/2038	\$82,562,318	\$27,969,372	\$0	-\$502,678,749	\$0	-\$21,799,266	\$0	\$0	\$0	-\$524,478,015	\$184,421,878	\$3,154,601,587
01/01/2039	12/31/2039	\$82,394,866	\$16,968,662	\$0	-\$487,447,018	\$0	-\$22,344,248	\$0	\$0	\$0	-\$509,791,266	\$171,163,295	\$2,915,337,144
01/01/2040	12/31/2040	\$82,242,940	\$1,564,514	\$0	-\$473,224,057	\$0	-\$22,902,854	\$0	\$0	\$0	-\$496,126,911	\$157,184,940	\$2,660,202,627
01/01/2041	12/31/2041	\$82,127,231	\$1,284,949	\$0	-\$456,695,086	\$0	-\$23,475,426	\$0	\$0	\$0	-\$480,170,512	\$142,757,382	\$2,406,201,677
01/01/2042	12/31/2042	\$82,027,849	\$161,931	\$0	-\$439,219,003	\$0	-\$24,062,311	\$0	\$0	\$0	-\$463,281,314	\$128,403,589	\$2,153,513,731
01/01/2043	12/31/2043	\$81,932,808	\$0	\$0	-\$423,518,955	\$0	-\$24,663,869	\$0	\$0	\$0	-\$448,182,824	\$114,095,820	\$1,901,359,534
01/01/2044	12/31/2044	\$81,840,030	\$0	\$0	-\$406,512,620	\$0	-\$24,390,757	\$0	\$0	\$0	-\$430,903,377	\$99,888,523	\$1,652,184,710
01/01/2045	12/31/2045	\$81,753,456	\$0	\$0	-\$390,020,809	\$0	-\$23,401,249	\$0	\$0	\$0	-\$413,422,058	\$85,858,590	\$1,406,374,698
01/01/2046	12/31/2046	\$81,682,549	\$0	\$0	-\$373,498,025	\$0	-\$22,409,882	\$0	\$0	\$0	-\$395,907,907	\$72,026,950	\$1,164,176,291
01/01/2047	12/31/2047	\$81,613,282	\$0	\$0	-\$357,753,663	\$0	-\$21,465,220	\$0	\$0	\$0	-\$379,218,883	\$58,380,714	\$924,951,403
01/01/2048	12/31/2048	\$81,555,192	\$0	\$0	-\$340,572,524	\$0	-\$20,434,351	\$0	\$0	\$0	-\$361,006,875	\$44,956,568	\$690,456,288
01/01/2049	12/31/2049	\$81,501,908	\$0	\$0	-\$325,586,558	\$0	-\$19,535,193	\$0	\$0	\$0	-\$345,121,751	\$31,736,151	\$458,572,595
01/01/2050	12/31/2050	\$81,453,279	\$0	\$0	-\$311,601,002	\$0	-\$18,696,060	\$0	\$0	\$0	-\$330,297,062	\$18,635,318	\$228,364,130
01/01/2051	12/31/2051	\$81,421,527	\$0	\$0	-\$297,566,257	\$0	-\$17,853,975	\$0	\$0	\$0	-\$315,420,232	\$5,634,576	\$0

TEMPLATE 6A - Sheet 6A-5

Item Description (from 6A-1):	Change Due to Death Audit
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Reconciliation - Details for the "basic method" under § 4262.4(a)(1) for non-MPRA plans, or for the "increasing assets method" under § 4262.4(a)(2)(i) for MPRA plans for which the requested amount of SFA is determined under that method

See Template 4A instructions for Sheet 4A-4 or Sheet 4A-5, except provide the projection used to determine the intermediate SFA amount.

PLAN INFORMATION

Abbreviated Plan Name:	BCPEN
EIN:	52-6118572
PN:	001
MPRA Plan?	No
If a MPRA Plan, which method yields the greatest amount of SFA?	N/A
SFA Measurement Date:	12/31/2022
Fair Market Value of Assets as of the SFA Measurement Date:	\$3,169,023,667
SFA Amount as of the SFA Measurement Date under the method calculated in this Sheet:	\$3,387,469,223
Non-SFA Interest Rate:	5.85%
SFA Interest Rate:	3.77%

On this Sheet, show payments INTO the plan as positive amounts, and payments OUT of the plan as negative amounts.

SFA Measurement Date / Plan Year Start Date	Plan Year End Date	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
		Contributions	Withdrawal Liability Payments	Other Payments to Plan (excluding financial assistance and SFA)	Benefit Payments	Make-up Payments Attributable to Reinstatement of Benefits Suspended through the SFA Measurement Date	Administrative Expenses (excluding amount owed PBGC under 4261 of ERISA)	Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from SFA Assets	SFA Investment Income Based on SFA Interest Rate	Projected SFA Assets at End of Plan Year (prior year assets + (7) + (8))	Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from Non-SFA Assets	Non-SFA Investment Income Based on Non-SFA Interest Rate	Projected Non-SFA Assets at End of Plan Year (prior year assets + (1) + (2) + (3) + (10) + (11))
12/31/2022	12/31/2023	\$118,084,930	\$31,096,536	\$0	-\$633,699,358	\$0	-\$14,349,568	-\$648,048,926	\$114,464,158	\$2,853,884,454	\$0	\$189,387,813	\$3,507,592,946
01/01/2024	12/31/2024	\$112,615,161	\$31,096,536	\$0	-\$627,833,424	\$0	-\$14,708,307	-\$642,541,731	\$94,516,415	\$2,305,859,138	\$0	\$209,047,457	\$3,860,352,100
01/01/2025	12/31/2025	\$107,422,109	\$31,063,602	\$0	-\$625,566,129	\$0	-\$15,076,015	-\$640,642,144	\$73,895,807	\$1,739,112,801	\$0	\$229,543,746	\$4,228,381,557
01/01/2026	12/31/2026	\$102,475,728	\$31,042,752	\$0	-\$621,657,059	\$0	-\$15,452,915	-\$637,109,974	\$52,602,784	\$1,154,605,611	\$0	\$250,940,285	\$4,612,840,322
01/01/2027	12/31/2027	\$97,800,901	\$31,028,358	\$0	-\$617,399,567	\$0	-\$15,839,238	-\$633,238,805	\$30,647,129	\$552,013,935	\$0	\$273,305,393	\$5,014,974,974
01/01/2028	12/31/2028	\$93,326,099	\$30,992,351	\$0	-\$610,440,595	\$0	-\$16,235,219	-\$552,013,935	\$0	\$0	-\$74,661,879	\$294,352,906	\$5,358,984,451
01/01/2029	12/31/2029	\$89,121,058	\$30,817,776	\$0	-\$603,240,019	\$0	-\$16,641,100	\$0	\$0	\$0	-\$619,881,119	\$297,155,093	\$5,156,197,259
01/01/2030	12/31/2030	\$85,117,202	\$30,788,979	\$0	-\$595,189,846	\$0	-\$17,057,127	\$0	\$0	\$0	-\$612,246,973	\$285,427,852	\$4,945,284,319
01/01/2031	12/31/2031	\$84,594,169	\$30,748,056	\$0	-\$586,222,166	\$0	-\$18,337,683	\$0	\$0	\$0	-\$604,559,849	\$273,324,152	\$4,729,390,847
01/01/2032	12/31/2032	\$84,178,302	\$30,671,101	\$0	-\$576,245,243	\$0	-\$18,796,125	\$0	\$0	\$0	-\$595,041,368	\$260,985,022	\$4,510,183,903
01/01/2033	12/31/2033	\$83,784,440	\$30,197,835	\$0	-\$564,837,895	\$0	-\$19,266,028	\$0	\$0	\$0	-\$584,103,923	\$248,487,037	\$4,288,549,292
01/01/2034	12/31/2034	\$83,515,949	\$29,703,417	\$0	-\$552,828,516	\$0	-\$19,747,679	\$0	\$0	\$0	-\$572,576,195	\$235,868,590	\$4,065,061,053
01/01/2035	12/31/2035	\$83,247,880	\$29,414,458	\$0	-\$540,279,975	\$0	-\$20,241,371	\$0	\$0	\$0	-\$560,521,346	\$223,163,987	\$3,840,366,032
01/01/2036	12/31/2036	\$83,000,949	\$28,379,304	\$0	-\$528,793,649	\$0	-\$20,747,405	\$0	\$0	\$0	-\$549,541,054	\$210,335,357	\$3,612,540,588
01/01/2037	12/31/2037	\$82,756,765	\$27,969,372	\$0	-\$517,600,095	\$0	-\$21,266,091	\$0	\$0	\$0	-\$538,866,186	\$197,330,819	\$3,381,731,358
01/01/2038	12/31/2038	\$82,566,202	\$27,969,372	\$0	-\$502,242,883	\$0	-\$21,797,743	\$0	\$0	\$0	-\$524,040,626	\$184,295,746	\$3,152,522,053
01/01/2039	12/31/2039	\$82,398,650	\$16,968,662	\$0	-\$487,059,299	\$0	-\$22,342,686	\$0	\$0	\$0	-\$509,401,985	\$171,054,071	\$2,913,541,450
01/01/2040	12/31/2040	\$82,246,634	\$1,564,514	\$0	-\$472,882,860	\$0	-\$22,901,254	\$0	\$0	\$0	-\$495,784,114	\$157,090,846	\$2,658,659,331
01/01/2041	12/31/2041	\$82,130,902	\$1,284,949	\$0	-\$456,392,353	\$0	-\$23,473,785	\$0	\$0	\$0	-\$479,866,138	\$142,676,835	\$2,404,885,879
01/01/2042	12/31/2042	\$82,031,249	\$161,931	\$0	-\$438,950,475	\$0	-\$24,060,630	\$0	\$0	\$0	-\$463,011,105	\$128,335,260	\$2,152,403,214
01/01/2043	12/31/2043	\$81,936,113	\$0	\$0	-\$423,283,873	\$0	-\$24,662,145	\$0	\$0	\$0	-\$447,946,018	\$114,038,439	\$1,900,431,748
01/01/2044	12/31/2044	\$81,843,103	\$0	\$0	-\$406,307,178	\$0	-\$24,378,431	\$0	\$0	\$0	-\$430,685,609	\$99,841,170	\$1,651,430,412
01/01/2045	12/31/2045	\$81,756,273	\$0	\$0	-\$389,845,131	\$0	-\$23,390,708	\$0	\$0	\$0	-\$413,235,839	\$85,820,388	\$1,405,771,234
01/01/2046	12/31/2046	\$81,685,217	\$0	\$0	-\$373,345,346	\$0	-\$22,400,721	\$0	\$0	\$0	-\$395,746,067	\$71,996,802	\$1,163,707,187
01/01/2047	12/31/2047	\$81,615,691	\$0	\$0	-\$357,620,158	\$0	-\$21,457,209	\$0	\$0	\$0	-\$379,077,367	\$58,357,781	\$924,603,291
01/01/2048	12/31/2048	\$81,557,381	\$0	\$0	-\$340,459,473	\$0	-\$20,427,568	\$0	\$0	\$0	-\$360,887,041	\$44,940,026	\$690,213,657
01/01/2049	12/31/2049	\$81,503,723	\$0	\$0	-\$325,490,306	\$0	-\$19,529,418	\$0	\$0	\$0	-\$345,019,724	\$31,725,211	\$458,422,867
01/01/2050	12/31/2050	\$81,454,770	\$0	\$0	-\$311,522,639	\$0	-\$18,691,358	\$0	\$0	\$0	-\$330,213,997	\$18,629,208	\$228,292,848
01/01/2051	12/31/2051	\$81,422,810	\$0	\$0	-\$297,498,449	\$0	-\$17,849,907	\$0	\$0	\$0	-\$315,348,356	\$5,632,698	\$0

Item Description (from 6A-1):

Change in Contraction to 4.6% for 10 years and 2.3% thereafter

TEMPLATE 6A - Sheet 6A-3

v20220802p

Reconciliation - Details for the "basic method" under § 4262.4(a)(1) for non-MPRA plans, or for the "increasing assets method" under § 4262.4(a)(2)(i) for MPRA plans for which the requested amount of SFA is determined under that method

See Template 4A instructions for Sheet 4A-4 or Sheet 4A-5, except provide the projection used to determine the intermediate SFA amount.

PLAN INFORMATION

Abbreviated Plan Name:	BCPEN
EIN:	52-6118572
PN:	001
MPRA Plan?	No
If a MPRA Plan, which method yields the greatest amount of SFA?	N/A
SFA Measurement Date:	12/31/2022
Fair Market Value of Assets as of the SFA Measurement Date:	\$3,169,023,667
SFA Amount as of the SFA Measurement Date under the method calculated in this Sheet:	\$3,462,787,939
Non-SFA Interest Rate:	5.85%
SFA Interest Rate:	3.77%

On this Sheet, show payments INTO the plan as positive amounts, and payments OUT of the plan as negative amounts.

SFA Measurement Date / Plan Year Start Date	Plan Year End Date	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
		Contributions	Withdrawal Liability Payments	Other Payments to Plan (excluding financial assistance and SFA)	Benefit Payments	Make-up Payments Attributable to Reinstatement of Benefits Suspended through the SFA Measurement Date	Administrative Expenses (excluding amount owed PBGC under 4261 of ERISA)	Benefit Payments (from (4) and (5)) and SFA Investment Income (from (6)) Paid from SFA Assets	SFA Investment Income Based on SFA Interest Rate	Projected SFA Assets at End of Plan Year (prior year assets + (7) + (8))	Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from Non-SFA Assets	Non-SFA Investment Income Based on Non-SFA Interest Rate	Projected Non-SFA Assets at End of Plan Year (prior year assets + (1) + (2) + (3) + (10) + (11))
12/31/2022	12/31/2023	\$128,776,199	\$31,096,536	\$0	-\$633,699,358	\$0	-\$14,349,568	-\$648,048,926	\$117,303,673	\$2,932,042,687	\$0	\$189,674,472	\$3,518,570,874
01/01/2024	12/31/2024	\$122,163,254	\$31,096,536	\$0	-\$627,833,424	\$0	-\$14,708,307	-\$642,541,731	\$97,462,980	\$2,386,963,936	\$0	\$209,945,674	\$3,881,776,338
01/01/2025	12/31/2025	\$115,905,773	\$31,063,602	\$0	-\$625,566,129	\$0	-\$15,076,015	-\$640,642,144	\$76,953,458	\$1,823,275,250	\$0	\$231,024,532	\$4,259,770,246
01/01/2026	12/31/2026	\$109,968,918	\$31,042,752	\$0	-\$621,811,506	\$0	-\$15,452,915	-\$637,264,421	\$55,772,554	\$1,241,783,383	\$0	\$252,977,435	\$4,653,759,530
01/01/2027	12/31/2027	\$104,373,153	\$31,028,358	\$0	-\$617,581,563	\$0	-\$15,839,238	-\$633,420,801	\$33,930,015	\$642,292,596	\$0	\$275,875,375	\$5,065,036,236
01/01/2028	12/31/2028	\$99,042,791	\$30,992,351	\$0	-\$610,637,266	\$0	-\$16,235,219	-\$626,872,485	\$11,464,178	\$26,884,289	\$0	\$299,791,187	\$5,494,862,566
01/01/2029	12/31/2029	\$94,043,729	\$30,817,776	\$0	-\$603,442,540	\$0	-\$16,641,100	-\$626,884,289	\$0	\$0	-\$593,199,351	\$306,077,913	\$5,332,602,633
01/01/2030	12/31/2030	\$89,303,603	\$30,788,979	\$0	-\$595,750,949	\$0	-\$17,057,127	\$0	\$0	\$0	-\$612,808,076	\$295,842,034	\$5,135,729,172
01/01/2031	12/31/2031	\$84,835,724	\$30,748,056	\$0	-\$586,871,814	\$0	-\$18,341,108	\$0	\$0	\$0	-\$605,212,922	\$284,450,975	\$4,930,551,006
01/01/2032	12/31/2032	\$80,656,485	\$30,671,101	\$0	-\$576,907,895	\$0	-\$18,799,635	\$0	\$0	\$0	-\$595,707,530	\$272,637,371	\$4,718,808,433
01/01/2033	12/31/2033	\$78,467,489	\$30,197,835	\$0	-\$565,491,496	\$0	-\$19,269,626	\$0	\$0	\$0	-\$584,761,122	\$260,528,204	\$4,503,240,839
01/01/2034	12/31/2034	\$76,445,091	\$29,703,417	\$0	-\$553,469,152	\$0	-\$19,751,367	\$0	\$0	\$0	-\$573,220,519	\$248,218,059	\$4,284,386,886
01/01/2035	12/31/2035	\$74,463,562	\$29,414,458	\$0	-\$541,430,194	\$0	-\$20,245,151	\$0	\$0	\$0	-\$561,675,345	\$235,722,470	\$4,062,312,031
01/01/2036	12/31/2036	\$72,542,502	\$28,379,304	\$0	-\$530,185,217	\$0	-\$20,751,280	\$0	\$0	\$0	-\$550,936,497	\$222,994,582	\$3,835,291,922
01/01/2037	12/31/2037	\$70,662,751	\$27,969,372	\$0	-\$519,110,086	\$0	-\$21,270,062	\$0	\$0	\$0	-\$540,380,148	\$209,989,547	\$3,603,533,444
01/01/2038	12/31/2038	\$68,874,154	\$27,969,372	\$0	-\$503,877,470	\$0	-\$21,801,813	\$0	\$0	\$0	-\$525,679,283	\$196,852,145	\$3,371,549,832
01/01/2039	12/31/2039	\$67,145,413	\$16,968,662	\$0	-\$488,695,531	\$0	-\$22,346,859	\$0	\$0	\$0	-\$511,042,390	\$183,406,259	\$3,128,027,776
01/01/2040	12/31/2040	\$65,461,394	\$15,64,514	\$0	-\$474,768,631	\$0	-\$22,905,530	\$0	\$0	\$0	-\$497,674,161	\$169,128,372	\$2,866,507,895
01/01/2041	12/31/2041	\$63,858,488	\$1,284,949	\$0	-\$458,237,756	\$0	-\$23,478,168	\$0	\$0	\$0	-\$481,715,924	\$154,287,453	\$2,604,222,861
01/01/2042	12/31/2042	\$62,301,529	\$1,619,931	\$0	-\$440,790,711	\$0	-\$24,065,122	\$0	\$0	\$0	-\$464,855,833	\$139,409,037	\$2,341,239,524
01/01/2043	12/31/2043	\$60,783,516	\$0	\$0	-\$425,101,816	\$0	-\$24,666,751	\$0	\$0	\$0	-\$449,768,567	\$124,460,479	\$2,076,714,953
01/01/2044	12/31/2044	\$59,297,826	\$0	\$0	-\$407,920,170	\$0	-\$24,475,210	\$0	\$0	\$0	-\$432,395,380	\$109,495,536	\$1,813,112,935
01/01/2045	12/31/2045	\$57,846,503	\$0	\$0	-\$391,461,130	\$0	-\$23,487,668	\$0	\$0	\$0	-\$414,948,798	\$94,583,928	\$1,550,594,568
01/01/2046	12/31/2046	\$56,451,019	\$0	\$0	-\$374,591,157	\$0	-\$22,475,469	\$0	\$0	\$0	-\$397,066,626	\$79,750,894	\$1,289,729,855
01/01/2047	12/31/2047	\$55,081,850	\$0	\$0	-\$358,525,976	\$0	-\$21,511,559	\$0	\$0	\$0	-\$380,037,535	\$64,988,508	\$1,029,762,679
01/01/2048	12/31/2048	\$53,756,098	\$0	\$0	-\$340,993,086	\$0	-\$20,459,585	\$0	\$0	\$0	-\$361,452,671	\$50,328,661	\$772,394,766
01/01/2049	12/31/2049	\$52,462,343	\$0	\$0	-\$325,514,539	\$0	-\$19,530,872	\$0	\$0	\$0	-\$345,045,411	\$35,753,327	\$515,565,025
01/01/2050	12/31/2050	\$51,199,905	\$0	\$0	-\$311,342,431	\$0	-\$18,680,546	\$0	\$0	\$0	-\$330,022,977	\$21,166,816	\$257,908,769
01/01/2051	12/31/2051	\$49,988,760	\$0	\$0	-\$296,649,253	\$0	-\$17,798,955	\$0	\$0	\$0	-\$314,448,208	\$6,550,679	\$0

TEMPLATE 6A - Sheet 6A-4

Item Description (from 6A-1):	Change in Collectible Withdrawal Liability Payments Made from Employers Assumed To Withdraw After the Measurement Date
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v20220802p

Reconciliation - Details for the "basic method" under § 4262.4(a)(1) for non-MPRA plans, or for the "increasing assets method" under § 4262.4(a)(2)(i) for MPRA plans for which the requested amount of SFA is determined under that method

See Template 4A instructions for Sheet 4A-4 or Sheet 4A-5, except provide the projection used to determine the intermediate SFA amount.

PLAN INFORMATION

Abbreviated Plan Name:	BCPEN
EIN:	52-6118572
PN:	001
MPRA Plan?	No
If a MPRA Plan, which method yields the greatest amount of SFA?	N/A
SFA Measurement Date:	12/31/2022
Fair Market Value of Assets as of the SFA Measurement Date:	\$3,169,023,667
SFA Amount as of the SFA Measurement Date under the method calculated in this Sheet:	\$3,205,792,485
Non-SFA Interest Rate:	5.85%
SFA Interest Rate:	3.77%

On this Sheet, show payments INTO the plan as positive amounts, and payments OUT of the plan as negative amounts.

SFA Measurement Date / Plan Year Start Date	Plan Year End Date	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
		Contributions	Withdrawal Liability Payments	Other Payments to Plan (excluding financial assistance and SFA)	Benefit Payments	Make-up Payments Attributable to Reinstatement of Benefits Suspended through the SFA Measurement Date	Administrative Expenses (excluding amount owed PBGC under 4261 of ERISA)	Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from SFA Assets	SFA Investment Income Based on SFA Interest Rate	Projected SFA Assets at End of Plan Year (prior year assets + (7) + (8))	Benefit Payments (from (4) and (5)) and Administrative Expenses (from (6)) Paid from Non-SFA Assets	Non-SFA Investment Income Based on Non-SFA Interest Rate	Projected Non-SFA Assets at End of Plan Year (prior year assets + (1) + (2) + (3) + (10) + (11))
12/31/2022	12/31/2023	\$128,776,199	\$31,096,536	\$0	-\$633,699,358	\$0	-\$14,349,568	-\$648,048,926	\$107,614,945	\$2,665,358,504	\$0	\$189,674,472	\$3,518,570,874
01/01/2024	12/31/2024	\$122,163,254	\$61,012,054	\$0	-\$627,833,424	\$0	-\$14,708,307	-\$642,541,731	\$87,408,987	\$2,110,225,759	\$0	\$210,747,784	\$3,912,493,966
01/01/2025	12/31/2025	\$115,905,773	\$50,141,697	\$0	-\$625,566,129	\$0	-\$15,076,015	-\$640,642,144	\$66,520,428	\$1,536,104,044	\$0	\$233,333,045	\$4,311,874,481
01/01/2026	12/31/2026	\$109,968,918	\$50,840,623	\$0	-\$621,811,506	\$0	-\$15,452,915	-\$637,264,421	\$44,946,200	\$943,785,823	\$0	\$256,556,363	\$4,729,240,385
01/01/2027	12/31/2027	\$104,373,153	\$51,545,696	\$0	-\$617,581,563	\$0	-\$15,839,238	-\$633,420,801	\$22,695,507	\$333,060,528	\$0	\$280,841,137	\$5,166,000,370
01/01/2028	12/31/2028	\$99,042,791	\$52,102,275	\$0	-\$610,637,266	\$0	-\$16,235,219	-\$333,060,528	\$0	\$0	-\$293,811,957	\$296,990,528	\$5,320,324,008
01/01/2029	12/31/2029	\$94,043,729	\$52,623,099	\$0	-\$603,442,540	\$0	-\$16,641,100	\$0	\$0	\$0	-\$620,083,640	\$295,603,684	\$5,142,510,880
01/01/2030	12/31/2030	\$89,303,603	\$53,065,220	\$0	-\$595,750,949	\$0	-\$17,057,127	\$0	\$0	\$0	-\$612,808,076	\$285,318,948	\$4,957,390,574
01/01/2031	12/31/2031	\$84,835,724	\$53,592,267	\$0	-\$586,871,814	\$0	-\$18,341,108	\$0	\$0	\$0	-\$605,212,922	\$274,630,678	\$4,765,236,322
01/01/2032	12/31/2032	\$80,656,485	\$53,988,656	\$0	-\$576,907,895	\$0	-\$18,799,635	\$0	\$0	\$0	-\$595,707,530	\$263,591,664	\$4,567,765,597
01/01/2033	12/31/2033	\$78,467,489	\$53,883,402	\$0	-\$565,491,496	\$0	-\$19,269,626	\$0	\$0	\$0	-\$584,761,122	\$252,327,267	\$4,367,682,633
01/01/2034	12/31/2034	\$76,445,091	\$44,194,658	\$0	-\$553,469,152	\$0	-\$19,751,367	\$0	\$0	\$0	-\$573,220,519	\$240,676,450	\$4,155,778,313
01/01/2035	12/31/2035	\$74,463,562	\$43,905,699	\$0	-\$541,430,194	\$0	-\$20,245,151	\$0	\$0	\$0	-\$561,675,345	\$228,587,415	\$3,941,059,644
01/01/2036	12/31/2036	\$72,542,502	\$42,870,545	\$0	-\$530,185,217	\$0	-\$20,751,280	\$0	\$0	\$0	-\$550,936,497	\$216,289,864	\$3,721,826,058
01/01/2037	12/31/2037	\$70,662,751	\$42,460,613	\$0	-\$519,110,086	\$0	-\$21,270,062	\$0	\$0	\$0	-\$540,380,148	\$203,740,340	\$3,498,309,614
01/01/2038	12/31/2038	\$68,874,154	\$42,460,613	\$0	-\$503,877,470	\$0	-\$21,801,813	\$0	\$0	\$0	-\$525,679,283	\$191,085,097	\$3,275,050,196
01/01/2039	12/31/2039	\$67,145,413	\$31,459,903	\$0	-\$488,695,531	\$0	-\$22,346,859	\$0	\$0	\$0	-\$511,042,390	\$178,149,577	\$3,040,762,699
01/01/2040	12/31/2040	\$65,461,394	\$16,055,755	\$0	-\$474,768,631	\$0	-\$22,905,530	\$0	\$0	\$0	-\$497,674,161	\$164,411,911	\$2,789,017,598
01/01/2041	12/31/2041	\$63,858,488	\$15,776,190	\$0	-\$458,237,756	\$0	-\$23,478,168	\$0	\$0	\$0	-\$481,715,924	\$150,142,817	\$2,537,079,169
01/01/2042	12/31/2042	\$62,301,529	\$14,653,172	\$0	-\$440,790,711	\$0	-\$24,065,122	\$0	\$0	\$0	-\$464,855,833	\$135,869,678	\$2,285,047,714
01/01/2043	12/31/2043	\$60,783,516	\$14,491,241	\$0	-\$425,101,816	\$0	-\$24,666,751	\$0	\$0	\$0	-\$449,768,567	\$121,561,805	\$2,032,115,709
01/01/2044	12/31/2044	\$59,297,826	\$11,548,731	\$0	-\$407,920,170	\$0	-\$24,475,210	\$0	\$0	\$0	-\$432,395,380	\$107,196,130	\$1,777,763,017
01/01/2045	12/31/2045	\$57,846,503	\$9,961,624	\$0	-\$391,461,130	\$0	-\$23,487,668	\$0	\$0	\$0	-\$414,948,798	\$92,783,054	\$1,523,405,401
01/01/2046	12/31/2046	\$56,451,019	\$8,459,829	\$0	-\$374,591,157	\$0	-\$23,475,469	\$0	\$0	\$0	-\$397,066,626	\$78,387,157	\$1,269,636,780
01/01/2047	12/31/2047	\$55,081,850	\$7,034,984	\$0	-\$358,525,976	\$0	-\$21,511,559	\$0	\$0	\$0	-\$380,037,535	\$64,001,689	\$1,015,717,768
01/01/2048	12/31/2048	\$53,756,098	\$5,692,000	\$0	-\$340,993,086	\$0	-\$20,459,585	\$0	\$0	\$0	-\$361,452,671	\$49,659,651	\$763,372,845
01/01/2049	12/31/2049	\$52,462,343	\$4,412,713	\$0	-\$325,514,539	\$0	-\$19,530,872	\$0	\$0	\$0	-\$345,045,411	\$35,343,860	\$510,546,351
01/01/2050	12/31/2050	\$51,199,905	\$3,212,938	\$0	-\$311,342,431	\$0	-\$18,680,546	\$0	\$0	\$0	-\$330,022,977	\$20,959,370	\$255,895,588
01/01/2051	12/31/2051	\$49,988,760	\$2,075,308	\$0	-\$296,649,253	\$0	-\$17,798,955	\$0	\$0	\$0	-\$314,448,208	\$6,488,552	\$0

Version Updates

Version	Date updated
v20220701p	07/01/2022

TEMPLATE 7

v20220701p

7a - Assumption/Method Changes for SFA Eligibility

File name: *Template 7 Plan Name*, where "Plan Name" is an abbreviated version of the plan name.

Instructions for Section C, Item (7)a. of the Instructions for Filing Requirements for Multiemployer Plans Applying for Special Financial Assistance:

Sheet 7a of Template 7 is not required if the plan is eligible for SFA under § 4262.3(a)(2) (MPRA suspensions) or § 4262.3(a)(4) (certain insolvent plans) of PBGC's special financial assistance regulation.

Sheet 7a of Template 7 is not required if the plan is eligible based on a certification of plan status completed before January 1, 2021.

Sheet 7a of Template 7 is not required if the plan is eligible based on a certification of plan status completed after December 31, 2020 but reflects the same assumptions as those in the pre-2021 certification of plan status.

Provide a table identifying which assumptions/methods used in determining the plan's eligibility for SFA differ from those used in the pre-2021 certification of plan status and brief explanations as to why using those assumptions/methods is no longer reasonable and why the changed assumptions/methods are reasonable.

This table should identify all changed assumptions/methods (including those that are reflected in the Baseline provided in Template 5A or Template 5B) and should be an abbreviated version of information provided in Section D, Item (6)a. of the SFA filing instructions.

For example, if the mortality assumption used in the pre-2021 certification of plan status is the RP-2000 mortality table, and the plan proposes to change to the Pri-2012(BC) table, complete one line of the table as follows:

	(A)	(B)	(C)
Assumption/Method That Has Changed From Assumption/Method Used in Most Recent Certification of Plan Status Completed Prior to 1/1/2021	Brief description of assumption/method used in the most recent certification of plan status completed prior to 1/1/2021	Brief description of assumption/method used in showing the plan's eligibility for SFA (if different)	Brief explanation on why the assumption/method in (A) is no longer reasonable and why the assumption/method in (B) is reasonable
Base Mortality Assumption	RP-2000 mortality table	Pri-2012(BC) mortality table	Prior assumption is outdated. New assumption reflects more recently published experience for blue collar workers.

Add one line for each assumption/method that has changed from that used in the most recent certification of plan status completed prior to 1/1/2021.

Since this Template 7a is intended as an abbreviated version of more detailed information provided in Section D, Item (6)a. of the SFA filing instructions, it is not necessary to include full tables of rates at every age (e.g., for retirement, turnover, etc.). Instead, a high level description that focuses on what aspect of the assumption/method has changed is preferred.

TEMPLATE 7

v20220701p

7b - Assumption/Method Changes for SFA Amount

File name: *Template 7 Plan Name*, where "Plan Name" is an abbreviated version of the plan name.

Instructions for Section C, Item (7)b. of the Instructions for Filing Requirements for Multiemployer Plans Applying for Special Financial Assistance:

Provide a table identifying which assumptions/methods used in determining the amount of SFA differ from those used in the pre-2021 certification of plan status (except the non-SFA and SFA interest rates) and brief explanations as to why using those original assumptions/methods is no longer reasonable and why the changed assumptions/methods are reasonable.

Please state if the changed assumption is an extension of the CBU assumption or the administrative expenses assumption as described in Paragraph A "Adoption of assumptions not previously factored into pre-2021 certification of plan status" of Section III, Acceptable Assumption Changes of PBGC's guidance on Special Financial Assistance Assumptions.

This table should identify all changed assumptions/methods except for the interest rates (including those that are reflected in the Baseline provided in Template 5A or Template 5B) and should be an abbreviated version of information provided in Section D, Item (6)b. of the SFA filing instructions.

For example, if the mortality assumption used in the pre-2021 certification of plan status is the RP-2000 mortality table, and the plan proposes to change to the Pri-2012(BC) table, complete one line of the table as follows:

	(A)	(B)	(C)
Assumption/Method That Has Changed From Assumption Used in Most Recent Certification of Plan Status Completed Prior to 1/1/2021	Brief description of assumption/method used in the most recent certification of plan status completed prior to 1/1/2021	Brief description of assumption/method used to determine the requested SFA amount (if different)	Brief explanation on why the assumption/method in (A) is no longer reasonable and why the assumption/method in (B) is reasonable
Base Mortality Assumption	RP-2000 mortality table	Pri-2012(BC) mortality table	Original assumption is outdated. New assumption reflects more recently published experience for blue collar workers.

For example, assume the plan is projected to be insolvent in 2029 in the pre-2021 certification of plan status. The plan changes its CBU assumption by extending the assumption to the later projection years as described in Paragraph A, "Adoption of assumptions not previously factored into pre-2021 certification of plan status" of Section III, Acceptable Assumption Changes of PBGC's guidance on Special Financial Assistance Assumptions. Complete one line of the table as follows:

	(A)	(B)	(C)
Assumption/Method That Has Changed From Assumption Used in Most Recent Certification of Plan Status Completed Prior to 1/1/2021	Brief description of assumption/method used in the most recent certification of plan status completed prior to 1/1/2021	Brief description of assumption/method used to determine the requested SFA amount (if different)	Brief explanation on why the assumption/method in (A) is no longer reasonable and why the assumption/method in (B) is reasonable
CBU Assumption	Decrease from most recent plan year's actual number of CBUs by 2% per year to 2028	Same number of CBUs for each projection year to 2028 as shown in (A), then constant CBUs for all years after 2028.	Original assumption does not address years after original projected insolvency in 2029. Proposed assumption uses acceptable extension methodology.

Add one line for each assumption/method that has changed from that used in the most recent certification of plan status completed prior to 1/1/2021.

Since this Template 7b is intended as an abbreviated version of more detailed information provided in Section D, Item (6)b. of the SFA filing instructions, it is not necessary to include full tables of rates at every age (e.g., for retirement, turnover, etc.). Instead, a high level description that focuses on what aspect of the assumption/method has changed is preferred.

Template 7 - Sheet 7b

v20220701p

Assumption/Method Changes - SFA Amount

PLAN INFORMATION

Abbreviated Plan Name:	BCPEN
EIN:	52-6118572
PN:	001

	(A)	(B)	(C)
Assumption/Method That Has Changed From Assumption Used in Most Recent Certification of Plan Status Completed Prior to 1/1/2021	Brief description of assumption/method used in the most recent certification of plan status completed prior to 1/1/2021	Brief description of assumption/method used to determine the requested SFA amount (if different)	Brief explanation on why the assumption/method in (A) is no longer reasonable and why the assumption/method in (B) is reasonable
Administrative Expenses	\$13,000,000 for 2019 increasing 2.5% per year to 2031	Annual expenses are assumed to be \$15,977,505 for 2023, \$14,324,051 for 2024 and \$14,600,152 for 2025, with 2.5% per year increases thereafter plus an adjustment for the PBGC premium increase to \$52 in 2031. The projected expenses were limited to 6% of expected benefit payments for post-certification projection years. PBGC premiums for each year are based on the projected total participant count on an open group basis.	Original assumption is no longer reasonable because it did not consider years after projected insolvency in 2031. New assumption is reasonable because it reflects 2022 actual expenses (net of one-time expenses in 2022) plus one-time expenses in 2023 and 2024, adjustments for PBGC premium increases in 2023 and 2024, and follows with acceptable methodology thereafter.
Mortality	RP-2006 Blue Collar and Disabled Retiree Mortality Tables with generational projection from 2006 with Scale MP-2018. Base table for Healthy Retirees adjusted by 108% factor.	PRI-2012 Blue Collar and Disabled Retiree Mortality Tables with generational projection from 2012 with Scale MP-2021	Original assumption is no longer reasonable because it is outdated. New assumption is reasonable because it reflects current experience for blue collar workers and uses the acceptable methodology from PBGC guidance.
New Entrant Profile	Similar characteristics to active participants hired in the 5 years ended December 31, 2018 based on the census data as of that date	Similar characteristics to new entrants and rehires in the 5 years ended December 31, 2020, with service for rehires excluding those returning from inactive vested status, as to not double-count previously vested accrued pension credits	Original assumption is no longer reasonable because it does not reflect recent new hires or rehires. New assumption is reasonable because it reflects all recent new entrants and rehires in the 5 years ended December 31, 2020 rather than only those remaining in service and uses the acceptable methodology from PBGC guidance.
Contribution Rates	Based on various negotiated contribution rates by each employer reflecting Rehabilitation Plan contribution rate increases through 2031 and the average contribution rate remaining level	Based on various negotiated contribution rates by each employer agreed to prior to July 9, 2021 and the average contribution rate based on an open group forecast	The original assumption is no longer reasonable because it included contribution rate increases beyond those agreed to prior to July 9, 2021, did not address years after 2031 and did not reflect that the average contribution rate varies over time. The new assumption is reasonable because it is consistent with the acceptable methodology from PBGC guidance and reflects projected future active participants in the average contribution rate.
"Missing" Terminated Vested Participants	Exclude participants over age 80	Exclude participants over age 85 as of the SFA measurement date	Original assumption is no longer reasonable because it is not appropriate for a long-term cash flow projection. New assumption is reasonable because it is consistent with PBGC "acceptable" assumption and current Plan practices.
CBUs	34,372,000 hours in 2019 declining by 4% per year to 2031	The actual total number of hours for the year ended December 31, 2022 was 33,615,309. The 2022 hours are assumed to decline by 4.6% per year for 10 years followed by 2.3% per year through the year ended December 31, 2051.	Original assumption is no longer reasonable because it did not consider years after projected insolvency and did not reflect recent historical contraction. New assumption is reasonable because it extends to 2051 and reflects recent historical contraction for all employers during the initial 10 year projection period and recent historical contraction for employers in the plan as of December 31, 2022, excluding the historical contraction of one large employer that withdrew due to bankruptcy.
Withdrawal Liability Payments for Current Withdrawn Employers	Withdrawn employers with collectible withdrawal liability as of January 1, 2020 would make all remaining withdrawal liability payments required for the duration of their payment schedules	Withdrawn employers with collectible withdrawal liability as of the SFA measurement date will make all remaining withdrawal liability payments required for the duration of their payment schedules	The original assumption is no longer reasonable because it did not address years after 2031 and does not reflect withdrawals and settlements since January 1, 2020. The new assumption is reasonable because it extends to 2051 and reflects withdrawals, settlements and defaults up to the SFA measurement date.
Withdrawal Liability Payments for Future Withdrawn Employers	None	During the years in which contraction is 4.6% - It is assumed that 24% of the decrease in contribution income will be replaced in the following year with annual withdrawal liability payments payable for 20 years plus 220% of the decrease in contribution income will be replaced in the following year with a one-time lump sum withdrawal liability payment.	During the 10-year period of assumed 4.6% contraction, the original assumption of \$0 future withdrawal liability income is unreasonable. New assumption is a reasonable replacement of withdrawal liability income due to lost contribution income, based on plan's history, excluding one large employer that paid \$0 of their withdrawal liability due to bankruptcy.

Version Updates

Version	Date updated	
v20220802p	08/02/2022	Cosmetic changes to increase the size of some rows
v20220701p	07/01/2022	

TEMPLATE 8

File name: *Template 8 Plan Name*, where "Plan Name" is an abbreviated version of the plan name.

v20220802p

Contribution and Withdrawal Liability Details

Provide details of the projected contributions and withdrawal liability payments used to calculate the requested SFA amount. This should include total contributions, contribution base units (including identification of the base unit used (i.e., hourly, weekly)), average contribution rate(s), reciprocity contributions (if applicable), additional contributions from the rehabilitation plan (if applicable), and any other identifiable contribution streams. For withdrawal liability, separately show amounts for currently withdrawn employers and for future assumed withdrawals. Also provide the projected number of active participants at the beginning of each plan year.

The first row in the projection period is for the period beginning on the SFA measurement date and ending on the last day of the plan year containing the SFA measurement date. For all other periods, provide the full plan year of information up to the plan year ending in 2051.

PLAN INFORMATION

Abbreviated Plan Name:	BCPEN
EIN:	52-6118572
PN:	001
Unit (e.g. hourly, weekly)	hourly

All Other Sources of Non-Investment Income

SFA Measurement Date / Plan Year Start Date	Plan Year End Date	Total Contributions*	Total Contribution Base Units	Average Contribution Rate	Reciprocity Contributions (if applicable)	Additional Rehab Plan Contributions (if applicable)	Other - Explain if Applicable	Withdrawal Liability Payments for Currently Withdrawn Employers	Withdrawal Liability Payments for Projected Future Withdrawals	Projected Number of Active Participants (Including New Entrants) at the Beginning of the Plan Year
12/31/2022	12/31/2023	\$128,776,199	32,069,005	\$4.02	\$0	\$0	\$0	\$31,096,536	\$0	16,035
01/01/2024	12/31/2024	\$122,163,254	30,593,831	\$3.99	\$0	\$0	\$0	\$31,096,536	\$29,915,518	15,297
01/01/2025	12/31/2025	\$115,905,773	29,186,514	\$3.97	\$0	\$0	\$0	\$31,063,602	\$19,078,095	14,593
01/01/2026	12/31/2026	\$109,968,918	27,843,935	\$3.95	\$0	\$0	\$0	\$31,042,752	\$19,797,871	13,922
01/01/2027	12/31/2027	\$104,373,153	26,563,114	\$3.93	\$0	\$0	\$0	\$31,028,358	\$20,517,338	13,282
01/01/2028	12/31/2028	\$99,042,791	25,341,210	\$3.91	\$0	\$0	\$0	\$30,992,351	\$21,109,924	12,671
01/01/2029	12/31/2029	\$94,043,729	24,175,515	\$3.89	\$0	\$0	\$0	\$30,817,776	\$21,805,323	12,088
01/01/2030	12/31/2030	\$89,303,603	23,063,441	\$3.87	\$0	\$0	\$0	\$30,788,979	\$22,276,241	11,532
01/01/2031	12/31/2031	\$84,835,724	22,002,523	\$3.86	\$0	\$0	\$0	\$30,748,056	\$22,844,211	11,001
01/01/2032	12/31/2032	\$80,656,485	20,990,407	\$3.84	\$0	\$0	\$0	\$30,671,101	\$23,317,555	10,495
01/01/2033	12/31/2033	\$78,467,489	20,507,627	\$3.83	\$0	\$0	\$0	\$30,197,835	\$23,685,567	10,254
01/01/2034	12/31/2034	\$76,445,091	20,035,952	\$3.82	\$0	\$0	\$0	\$29,703,417	\$14,491,241	10,018
01/01/2035	12/31/2035	\$74,463,562	19,575,125	\$3.80	\$0	\$0	\$0	\$29,414,458	\$14,491,241	9,788
01/01/2036	12/31/2036	\$72,542,502	19,124,897	\$3.79	\$0	\$0	\$0	\$28,379,304	\$14,491,241	9,562
01/01/2037	12/31/2037	\$70,662,751	18,685,025	\$3.78	\$0	\$0	\$0	\$27,969,372	\$14,491,241	9,343
01/01/2038	12/31/2038	\$68,874,154	18,255,269	\$3.77	\$0	\$0	\$0	\$27,969,372	\$14,491,241	9,128
01/01/2039	12/31/2039	\$67,145,413	17,835,398	\$3.76	\$0	\$0	\$0	\$16,968,662	\$14,491,241	8,918
01/01/2040	12/31/2040	\$65,461,394	17,425,184	\$3.76	\$0	\$0	\$0	\$1,564,514	\$14,491,241	8,713
01/01/2041	12/31/2041	\$63,858,488	17,024,404	\$3.75	\$0	\$0	\$0	\$1,284,949	\$14,491,241	8,512
01/01/2042	12/31/2042	\$62,301,529	16,632,843	\$3.75	\$0	\$0	\$0	\$161,931	\$14,491,241	8,316
01/01/2043	12/31/2043	\$60,783,516	16,250,288	\$3.74	\$0	\$0	\$0	\$0	\$14,491,241	8,125
01/01/2044	12/31/2044	\$59,297,826	15,876,531	\$3.73	\$0	\$0	\$0	\$0	\$11,548,731	7,938
01/01/2045	12/31/2045	\$57,846,503	15,511,371	\$3.73	\$0	\$0	\$0	\$0	\$9,961,624	7,756
01/01/2046	12/31/2046	\$56,451,019	15,154,609	\$3.73	\$0	\$0	\$0	\$0	\$8,459,829	7,577
01/01/2047	12/31/2047	\$55,081,850	14,806,053	\$3.72	\$0	\$0	\$0	\$0	\$7,034,984	7,403
01/01/2048	12/31/2048	\$53,756,098	14,465,514	\$3.72	\$0	\$0	\$0	\$0	\$5,692,000	7,233
01/01/2049	12/31/2049	\$52,462,343	14,132,807	\$3.71	\$0	\$0	\$0	\$0	\$4,412,713	7,066
01/01/2050	12/31/2050	\$51,199,905	13,807,753	\$3.71	\$0	\$0	\$0	\$0	\$3,212,938	6,904
01/01/2051	12/31/2051	\$49,988,760	13,490,174	\$3.71	\$0	\$0	\$0	\$0	\$2,075,308	6,745

* Total contributions shown here should be contributions based upon CBUs and should not include items separately shown in any columns under "All Other Sources of Non-Investment Income."

Version Updates

Version

Date updated

v20230727

v20230727

07/27/2023

TEMPLATE 10

v20230727

Pre-2021 Zone Certification, Baseline Details, and Final SFA Assumption Summaries

File name: *Template 10 Plan Name*, where "Plan Name" is an abbreviated version of the plan name.

Provide a table identifying and summarizing which assumptions/methods were used in each of the pre-2021 certification of plan status, the Baseline details (Template 5A or Template 5B), and the final SFA calculation (Template 4A or Template 4B).

This table should identify all assumptions/methods used, including those that are reflected in the Baseline provided in Template 5A or Template 5B and any assumptions not explicitly listed. Please identify the source (file and page number) of the pre-2021 certification of plan status assumption. Additionally, please select the appropriate assumption change category per SFA assumption guidance*. Please complete all rows of Template 10. If an assumption on Template 10 does not apply to the application, please enter "N/A" and explain as necessary in the "comments" column. If the application contains assumptions not listed on Template 10, create additional rows as needed.

See the table below for a brief example of how to fill out the requested information in summary form. In the example the first row demonstrates how one would fill out the information for a change in the mortality assumption used in the pre-2021 certification of plan status, where the RP-2000 mortality table was the original assumption, and the plan proposes to change to the Pri-2012(BC) table.

	(A)	(B)	(C)	(D)	(E)														
	Source of (B)	Assumption/Method Used in Most Recent Certification of Plan Status Completed Prior to 1/1/2021	Baseline Assumption/Method Used	Final SFA Assumption/Method Used	Category of assumption change from (B) to (D) per SFA Assumption Guidance														
Base Mortality - Healthy	2019 Company XYZ AVR.pdf p. 55	RP-2000 mortality table	Pri-2012(BC) mortality table	Same as baseline	Acceptable Change														
Contribution Base Units	2020 Company XYZ ZC.pdf p. 19	125,000 hours projected to insolvency in 2024	125,000 hours projected through the SFA projection period in 2051	100,000 hours projected with 3.0% reductions annually for 10 years and 1.0% reductions annually thereafter	Generally Acceptable Change														
Assumed Withdrawal Payments -Future Withdrawals	2020 Company XYZ ZC.pdf p. 20	None assumed until insolvency in 2024	None assumed through the SFA projection period in 2051	Same as baseline	Other Change														
Retirement - Actives	2019 Company XYZ AVR.pdf p. 54	<table border="0"> <tr> <td><u>Age</u></td> <td><u>Actives</u></td> </tr> <tr> <td>55</td> <td>10%</td> </tr> <tr> <td>56</td> <td>20%</td> </tr> <tr> <td>57</td> <td>30%</td> </tr> <tr> <td>58</td> <td>40%</td> </tr> <tr> <td>59</td> <td>50%</td> </tr> <tr> <td>60+</td> <td>100%</td> </tr> </table>	<u>Age</u>	<u>Actives</u>	55	10%	56	20%	57	30%	58	40%	59	50%	60+	100%	Same as Pre-2021 Zone Cert	Same as baseline	No Change
<u>Age</u>	<u>Actives</u>																		
55	10%																		
56	20%																		
57	30%																		
58	40%																		
59	50%																		
60+	100%																		

Add additional lines if needed.

*<https://www.pbgc.gov/sites/default/files/sfa/sfa-assumptions-guidance.pdf>

Template 10

v20230727

Pre-2021 Zone Certification, Baseline Details, and Final SFA Assumption Summaries

PLAN INFORMATION

Abbreviated Plan Name:	BCPEN
EIN:	52-6118572
PN:	001

	(A)	(B)	(C)	(D)	(E)	
	Source of (B)	Assumption/Method Used in Most Recent Certification of Plan Status Completed Prior to 1/1/2021	Baseline Assumption/Method Used	Final SFA Assumption/Method Used	Category of assumption change from (B) to (D) per SFA Assumption Guidance	Comments
SFA Measurement Date	N/A	N/A	12/31/2022	12/31/2022	N/A	
Census Data as of	N/A	N/A	12/31/2020	12/31/2020	N/A	

DEMOGRAPHIC ASSUMPTIONS

Base Mortality - Healthy	2019AVR BCPEN.pdf p. 63	RP-2006 (BC) Mortality Table (108% factor for pensioners)	Pri-2012 (BC) Mortality Table	Same as Baseline	Acceptable Change	
Mortality Improvement - Healthy	2019AVR BCPEN.pdf p. 63	Scale MP-2018	Scale MP-2021	Same as Baseline	Acceptable Change	
Base Mortality - Disabled	2019AVR BCPEN.pdf p. 63	RP-2006 Disabled Mortality Table	Pri-2012 Disabled Mortality Table	Same as Baseline	Acceptable Change	
Mortality Improvement - Disabled	2019AVR BCPEN.pdf p. 63	Scale MP-2018	Scale MP-2021	Same as Baseline	Acceptable Change	
Retirement - Actives	2019AVR BCPEN.pdf p. 65	Rates as described in 2019 AVR on page 65	Same as Pre-2021 Zone Cert	Same as Baseline	No Change	chart would not copy into excel
Retirement - TVs	2019AVR BCPEN.pdf p. 66	Rates as described in 2019 AVR on page 66	Same as Pre-2021 Zone Cert	Same as Baseline	No Change	chart would not copy into excel
Turnover	2019AVR BCPEN.pdf p. 64	2003 SOA Pension Plan Turnover Study - The Select & Ultimate Table	Same as Pre-2021 Zone Cert	Same as Baseline	No Change	
Disability	2019AVR BCPEN.pdf p. 64	50% of RRB table	Same as Pre-2021 Zone Cert	Same as Baseline	No Change	
Optional Form Elections - Actives	2019AVR BCPEN.pdf p. 67	30% elect the 50% Joint-and-Survivor form with a 36-month guarantee. 70% elect a Single Life Annuity with a 36-month guarantee. There is no guarantee for any participants retiring under the Default Schedule.	Same as Pre-2021 Zone Cert	Same as Baseline	No Change	
Optional Form Elections - TVs	2019AVR BCPEN.pdf p. 67	30% elect the 50% Joint-and-Survivor form with a 36-month guarantee. 70% elect a Single Life Annuity with a 36-month guarantee. There is no guarantee for any participants retiring under the Default Schedule.	Same as Pre-2021 Zone Cert	Same as Baseline	No Change	
Marital Status	2019AVR BCPEN.pdf p. 67	65% are assumed married	Same as Pre-2021 Zone Cert	Same as Baseline	No Change	
Spouse Age Difference	2019AVR BCPEN.pdf p. 67	Females three years younger than males, if actual age is unknown.	Same as Pre-2021 Zone Cert	Same as Baseline	No Change	
Active Participant Count	2020Zone20200330 BCPEN.pdf p.11	Active participants as of January 1, 2019 are assumed to decline by 4% per year until insolvency	Active participants as of January 1, 2019 are assumed to decline by 4% per year through the year ended December 31, 2030 (the last full plan year prior to the projected year of insolvency in the 2020 status certification). From 2031 to 2051, the active population is then assumed to remain at the same level as in 2030.	Active participant counts in a plan year are assumed to equal the assumed total number of hours for that year divided by 2,000 hours	Other Change	
New Entrant Profile	2020Zone20200330 BCPEN.pdf p.11	Similar characteristics to active participants hired in the 5 years ended December 31, 2018 based on the census data as of that date	Based on the characteristics of new entrants and rehires to the plan in the five plan years preceding the plan's SFA participant census data date of January 1, 2021 (reflecting all new entrants and rehires in those five plan years rather than only those remaining in service), with five-year age bands. New entrants are assumed to enter with 1.5 pension credits and one year of vesting service.	Same as Baseline	Acceptable Change	
Missing or Incomplete Data	2019AVR BCPEN.pdf p. 66	Same as those exhibited by participants with similar known characteristics. If not specified, participants are assumed to be male.	Same as Pre-2021 Zone Cert	Same as Baseline	No Change	
"Missing" Terminated Vested Participant Assumption	2019AVR BCPEN.pdf p. 66	Exclude participants over age 80.	Same as Pre-2021 Zone Cert	Exclude participants over age 85 as of the SFA measurement date.	Acceptable Change	
Treatment of Participants Working Past Retirement Date	2019AVR BCPEN.pdf p. 65	Working pensioners are assumed to permanently cease accruing benefits according to the rates as described in 2019 AVR on page 65	Same as Pre-2021 Zone Cert	Same as Baseline	No Change	
Assumptions Related to Reciprocity	N/A	None	Same as Pre-2021 Zone Cert	Same as Baseline	No Change	

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Pre-2021 Zone Certification, Baseline Details, and Final SFA Assumption Summaries

PLAN INFORMATION

Abbreviated Plan Name:	BCPEN
EIN:	52-6118572
PN:	001

	(A)	(B)	(C)	(D)	(E)	
	Source of (B)	Assumption/Method Used in Most Recent Certification of Plan Status Completed Prior to 1/1/2021	Baseline Assumption/Method Used	Final SFA Assumption/Method Used	Category of assumption change from (B) to (D) per SFA Assumption Guidance	Comments
Other Demographic Assumption 1						
Other Demographic Assumption 2						
Other Demographic Assumption 3						
NON-DEMOGRAPHIC ASSUMPTIONS						
Contribution Base Units	2020Zone20200330 BCPEN.pdf p.11	The 2020 status certification assumed that 17,186 active participants as of January 1, 2019 would decline by 4% per year until insolvency. The average CBUs per active participant was assumed to be 2,000 hours for all years until insolvency. Expressed in terms of total hours, the assumption was that 34,372,000 hours in 2019 would decline by 4% per year until insolvency.	Active participants as of January 1, 2019 are assumed to decline by 4% per year through the year ended December 31, 2030 (the last full plan year prior to the projected year of insolvency in the 2020 status certification). From 2031 to 2051, the active population is then assumed to remain at the same level as in 2030. The average CBUs per active participant was assumed to be 2,000 hours for all years through the year ended December 31, 2051. Expressed in terms of total hours, the assumption is that 34,372,000 hours in 2019 will decline by 4% per year through the year ended December 31, 2030 and then remain at the same level as in 2030 from 2031 to 2051.	The actual total number of hours for the year ended December 31, 2022 was 33,615,309. The 2022 hours are assumed to decline by 4.6% per year for 10 years followed by 2.3% per year through the year ended December 31, 2051.	Other Change	
Contribution Rate	2020Zone20200330 BCPEN.pdf p.11	The solvency projection in the 2020 status certification projected contributions based on the various negotiated contribution rates by each employer through 2031. It also included contribution rate increases beyond those contained in formal commitments by the collective bargaining parties that were required under the Rehabilitation Plan, (i.e., 5% contribution rate increases were assumed to continue through the year of insolvency). Average contribution rates were assumed to remain consistent across the projection period based on assumed consistent demographics and plan coverage by benefit level.	Projected contributions are based on the various negotiated contribution rates by each employer that were agreed to prior to July 9, 2021. The average contribution rate varies each year based on an open group forecast of future active participants, their negotiated benefit levels and corresponding contribution rates.	Same as Baseline	Acceptable Change	
Administrative Expenses	2019AVR BCPEN.pdf 67 and 2020Zone20200330 BCPEN.pdf p.10	Assumed annual expenses of \$13,000,000 for 2019 were assumed to increase by 2.5% per year until insolvency.	Annual expenses of \$14,349,568 for 2023 are assumed to increase 2.5% per year, plus an adjustment for the PBGC premium increase to \$52 in 2031. Note that \$14,349,568 is equal to \$13,000,000 for 2019 with four years of 2.5% increases to 2023. The projected expenses were limited to 6% of expected benefit payments for post-certification projection years. PBGC premiums for each year are based on the projected total participant count on an open group basis.	Annual expenses are assumed to be \$15,977,505 for 2023, \$14,324,051 for 2024 and \$14,600,152 for 2025, with 2.5% per year increases thereafter plus an adjustment for the PBGC premium increase to \$52 in 2031. The projected expenses were limited to 6% of expected benefit payments for post-certification projection years. PBGC premiums for each year are based on the projected total participant count on an open group basis.	Other Change	
Assumed Withdrawal Payments - Currently Withdrawn Employers	2020Zone20200330 BCPEN.pdf p.11	The 2020 status certification assumed that withdrawn employers deemed to have collectible withdrawal liability at that time would make all remaining withdrawal liability payments required for the duration of their payment schedules. The total amounts for each year were then rounded to the nearest \$100,000. The table in the 2020 status certification shows the 2020 status certification assumption for the years 2023 through 2031.	Withdrawn employers deemed to have collectible withdrawal liability as of the SFA measurement date are assumed to make all remaining withdrawal liability payments required for the duration of their payment schedules.	Same as Baseline		

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	(A)	(B)	(C)	(D)	(E)	
	Source of (B)	Assumption/Method Used in Most Recent Certification of Plan Status Completed Prior to 1/1/2021	Baseline Assumption/Method Used	Final SFA Assumption/Method Used	Category of assumption change from (B) to (D) per SFA Assumption Guidance	Comments
Assumed Withdrawal Payments -Future Withdrawals	2020Zone20200330 BCPEN.pdf p.11	The 2020 status certification assumed no withdrawal liability payments for future withdrawn employers.	Same as Pre-2021 Zone Cert	During the years in which contraction is 4.6% - It is assumed that 24% of the decrease in contribution income will be replaced in the following year with annual withdrawal liability payments payable for 20 years plus 220% of the decrease in contribution income will be replaced in the following year with a one-time lump sum withdrawal liability payment.	Other Change	
Other Assumption 1						
Other Assumption 2						
Other Assumption 3						
CASH FLOW TIMING ASSUMPTIONS						
Benefit Payment Timing	N/A	Beginning of Month	Same as Pre-2021 Zone Cert	Same as Baseline	Acceptable Change	
Contribution Timing	N/A	End of Month	Same as Pre-2021 Zone Cert	Same as Baseline	Acceptable Change	
Withdrawal Payment Timing	N/A	End of Month	Same as Pre-2021 Zone Cert	Same as Baseline	Acceptable Change	
Administrative Expense Timing	N/A	End of Month	Same as Pre-2021 Zone Cert	Same as Baseline	Acceptable Change	
Other Payment Timing						

Create additional rows as needed.