

JAY W. TOWER

Counselor at Law
12734 Ludlow Avenue
Huntington Woods, MI 48070

248-506-8945
towerlaw@mac.com

September 29, 2022

Pension Benefit Guaranty Corporation
1200 K Street, NW
Washington D.C. 20005-4026

Filed via PBGC portal

Re: Graphic Communications Union Local 2-C Retirement Benefit Plan

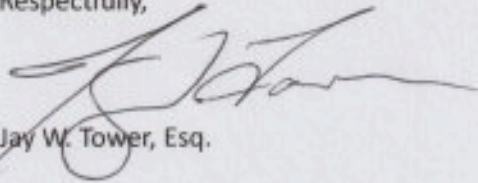
Ladies and Gentlemen:

Attached is the Supplemented Special Financial Assistance (SFA) Application for the above-named plan (the "Plan"). This is a supplemented application under the PBGC's Final rule effective August 8, 2022.

On April 18, 2022, the Plan's original SFA Application was approved under the PBGC's Interim Final Rule (IFR). The approved SFA amount was \$41,171,818 as of the SFA measurement date of June 30, 2021.

Thank you for your consideration of this Supplemented Application. Please contact me if you have any questions regarding this application.

Respectfully,



Jay W. Tower, Esq.

Required Trustee Signature
Relating to the Supplemented Special Financial Assistance Application
of the
Board of Administration of the Graphic Communications Union Local 2-C Retirement Benefit Plan

Pursuant to Pension Benefit Guaranty Corporation (PBGC) Final Rule, CFS part 4636 of the Employee Retirement Income Security Act of 1974 (ERISA) and published in the Federal Register on July 8, 2022, the Board of Administration of the Graphic Communications Union Local 2-C Retirement Benefit Plan submits this application, along with accompany exhibits, to the PBGC for approval of Special Financial Assistance.

9-23-22

Date



Israel Castro

Chair

Board of Administration of the Graphic
Communications Union Local 2-C Retirement
Benefit Plan

SECTION A – Plan identifying information		
(1)	Plan name	Graphic Communications Union Local 2-C Retirement Benefit Plan
(2)	Employer identification number (EIN)	38-6047082
(3)	Plan number (PN)	001
(4)	Notice filer name	Jay W. Tower, Esq. 12734 Ludlow Avenue Huntington Woods, MI 49070
(5)	Role of filer	Attorney
(6)	Total amount requested	\$41,381,264

SECTION B – Plan documents		
(1)	Plan documentation	N/A – not required for a supplemented application.
(2)	Actuarial valuation reports	N/A – not required for a supplemented application.
(3)	Rehabilitation plan or funding improvement plan	N/A – not required for a supplemented application.
(4)	Form 5500	N/A – not required for a supplemented application.
(5)	Zone certifications	N/A – not required for a supplemented application.
(6)	Account statements	N/A – not required for a supplemented application.
(7)	Plan’s financial statement	N/A – not required for a supplemented application.
(8)	Withdrawal liability documentation	N/A – not required for a supplemented application.
(9)	Death Audit	N/A – not required for a supplemented application.
(10)	Automated Clearing House (ACH) Vendor/Miscellaneous Payment Enrollment Form	Elec Transfer Info GCU 2-C.pdf (Document type - “Other”)

SECTION C – Plan data		
(1)	Form 5500 projection	N/A – not required for a supplemented application.
(2)	Contributing employers	N/A – not required for a supplemented application.
(3)	Historical plan information	N/A – not required for a supplemented application.
(4)	SFA determination	Template 4A Supp GCU 2-C.xlsx (Document type - “Projections for special financial assistance (estimated income, benefit payments and expenses”)
(5)	Baseline details	N/A – not required for a supplemented application.
(6)	Reconciliation details	N/A – not required for a supplemented application.
(7)	Assumption details	N/A – not required for a supplemented application.
(8)	Contributions and withdrawal liability details	N/A – not required for a supplemented application.
(9)	Participant data	N/A – not required for a supplemented application.

SECTION D – Plan statements (Please see third page of this document for authorized Trustee signature)		
(1)	Cover letter	Please see the first page of this document
(2)	Plan sponsor, plan representative information	
	Plan sponsor	Board of Trustees of Graphic Communications Union Local 2-C Retirement Benefit Plan 11420 East Nine Mile Road Warren, MI 48089 (586) 755-8073
	Plan attorney	Mr. Jay W. Tower, Esq. 12734 Ludlow Avenue Huntington Woods, MI 48070 towerlaw@mac.com (248) 506-8945
	Plan actuary	Mr. Troy Schnabel Watkins Ross 200 Ottawa Avenue, N.W., Suite 600 Grand Rapids, MI 49503-2426 tschnabel@watkinsross.com (616) 456-9696
(3)	Eligibility criteria	N/A – not required for a supplemented application.
(4)	Priority group	N/A – not required for a supplemented application.
(5)	Development of the assumed future contributions and the assumed future withdrawal liability payments	To compute the SFA amount: <u>Assumed future contributions</u> For active participants – 260 shifts/year, \$13.82/shift – For delinquent employer - \$1,200 per year <u>Assumed future withdrawal liability payments</u> – None Future contributions are based upon assumptions used in the January 1, 2020 actuarial certification as well as conversations with the contributing employer. There are no outstanding assessments of withdrawal liability, accordingly, no future payments are projected.
(6)	Assumptions	N/A – not required for a supplemented application.
(7)	How the plan will reinstate benefits	N/A – not required for a supplemented application.

SECTION E – Checklist and certifications		
(1)	SFA Application Checklist	App Checklist Supp GCU 2-C.xlsx (Document type - “Special Financial Assistance Checklist”)
(2)	SFA Eligibility Certification and Supporting Information for Critical & Declining Plan	N/A – not required for a supplemented application.
(3)	SFA Eligibility Certification and Supporting Information for Critical Plan	N/A – not required for a supplemented application.
(4)	Priority Status	N/A – not required for a supplemented application.
(5)	SFA Amount Certification	SFA Amount Cert Supp GCU 2-C.pdf (Document type - “Financial Assistance Application”)
(6)	Fair Market Value Certification	N/A – not required for a supplemented application.
(7)	Executed Plan Amendment for SFA Compliance	N/A – not required for a supplemented application.
(8)	Proposed Plan amendment to Reinstate Benefits	N/A – not required for a supplemented application.
(9)	Executed Plan amendment to Rescind Partition Order	N/A – not required for a supplemented application.
(10)	Penalty of Perjury statement	Penalty GCU 2-C.pdf , second page of this document (Document type - “Financial Assistance Application”)

SECTION F – Additional information required for a Supplemented Application for a plan that is not a MPRA plan			
(1)	Reconciliation		
	Change due to calculating the amount of SFA using the “basic method” described in §4262.4(a)(1) of PBGC’s SFA regulation	Requested SFA amount under “Basic Method”	\$41,381,264
		Approved SFA amount under Interim Final Rule (IFR)	\$41,171,818
		Change in requested SFA amount	\$209,446
		Template 9 GCU 2-C.xlsx (Document type - “Projections for special financial assistance (estimated income, benefit payments and expenses”)	
	Change in the amount of SFA using the “basis method” due to a change in the assumed employer contributions	Zero. There is no change in the assumed employer contributions from the Plan’s application under IFR.	

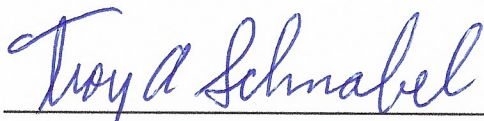
SUPPLEMENTED SPECIAL FINANCIAL ASSISTANCE APPLICATION
SECTION E – Checklist and certifications, Item 5
SFA Amount Certification

Plan Name: Graphic Communications Union Local 2-C Retirement Benefit Plan
EIN/PN: 38-6047082/001

I am an Enrolled Actuary who satisfies the qualifications set forth in the regulations of the Joint Board for the Enrollment of Actuaries and I have been approved by the Joint Board to perform actuarial services under the Employee Retirement Income Security Act of 1974 (ERISA). I am a member of the American Academy of Actuaries who meets the Qualification Standards of the American Academy of Actuaries to render the actuarial opinion contained herein.

This Application for Special Financial Assistance was prepared on behalf of the Board of Administration based on employee data, asset statements and plan documents provided by the plan sponsor or its representatives. The data, as submitted, was relied upon without formal audit. However, the data was tested for reasonableness, and have no reason to believe that any other information which would have had a material effect on the results of this valuation was overlooked.

Therefore, I certify that the requested Special Financial Assistance (SFA) amount of \$41,381,264 under the final rule, as of SFA measurement date of June 30, 2021, is the total SFA amount to which the plan is entitled under Section 4262(j)(1) of ERISA and § 4262.4 of PBGC's SFA regulation. I confirm that all assumptions and methods used, sources of participant census data, SFA measurement date, participant census date, and other relevant information are the same as those used in the application that was approved under the interim final rule, with the exception of the non-SFA and SFA interest rates and the application of the new calculation methodology under the final rule.



Troy A. Schnabel, FCA, ASA, MAAA
Enrolled actuary #20-06116



Date

Statement of Israel Castro
Regarding Facts
Relating to the Supplemented Special Financial Assistance Application
of the

Board of Administration of the Graphic Communications Union Local 2-C Retirement Benefit Plan

Under penalty of perjury under the laws of the United States of America, I declare that I have examined this application, including accompanying documents, and, to the best of my 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.

9-29-22

Date



Israel Castro

Chair

Board of Administration of the Graphic
Communications Union Local 2-C Retirement
Benefit Plan

This document goes into effect August 8, 2022. Any applications filed before then would be under the interim final rule.

Application Checklist - Supplemented

v20220706p

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


The Supplemented Application to PBGC for Approval of Special Financial Assistance Checklist ("Application Checklist - Supplemented") identifies all information required to be filed with a supplemented application if the plan is requesting additional SFA. For a plan not requesting additional SFA, no checklist is required. For other SFA applications, use the SFA Application Checklist.

For a plan required to submit additional information described in Addendum A of the SFA Filing Instructions, also complete and submit the Additional Information for Certain Events section of the SFA Application Checklist.

Supplemented applications (including this Application Checklist - Supplemented), 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: a new supplemented application submitted after the denial or withdrawal of a previously filed supplemented application must also 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 - Supplemented:

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 new supplemented application submitted after the denial or withdrawal of a previously filed supplemented application, the filer may, but is not required to, submit an entire application. For all Application Checklist - Supplemented 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 - Supplemented 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 - Supplemented, 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 #10 to #10b, 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 #16 on the Application Checklist.** If there has been a plan merger as described in § 4262.4(f)(1)(ii), you also must provide the separate Application Checklist - Certain Events.

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 #c.

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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v20220706p

07/06/2022

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

v20220706p

APPLICATION CHECKLIST - SUPPLEMENTED

Plan name:	GCU 2-C Retirement Benefit Plan
EIN:	38-6047082
PN:	001
SFA Amount Approved Under Interim Final Rule:	\$41,171,818
SFA Amount Requested Under Final Rule:	\$41,381,264
Your application will be considered incomplete if No is entered as a Plan Response for any of Checklist Items #1 through #16.	

This Application Checklist - Supplemented is only used for a supplemented application. See Application Checklist for all other applications.

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

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

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
a.		Is this application a new supplemented application, submitted after the denial of a previously filed supplemented application for SFA?	Yes No	No	N/A	N/A		N/A	N/A
b.		Is this application a new supplemented application, submitted after a plan has withdrawn its previously filed supplemented application for SFA?	Yes No	No	N/A	N/A		N/A	N/A
c.		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 (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	Elec Transfer Info GCU 2-C.pdf	Other	N/A
2.	Section C, Items (4)a., (4)e., and (4)f. (Also See Addendum C, Section C, Item (4))	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 .A(a)(1) sheet, Section C, Item (4) of the SFA Filing Instructions and Addendum C for more details on these requirements. Does the uploaded file use the required filenaming convention?	Yes No	Yes	Template 4A Supp GCU 2-C.xlsx	N/A		Projections for special financial assistance (estimated income, benefit payments and expenses)	Template 4A Supp Plan Name
3.a.	Addendum C Section G, Item (1)	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 .A(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	Template 4A Supp Plan Name
3.b.	Addendum C Section G, Item (1)	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 .A(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	Template 4A Supp Plan Name

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

v20220706p

APPLICATION CHECKLIST - SUPPLEMENTED

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SFA Amount Approved Under Interim Final Rule:	\$41,171,818
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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 #16.	

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

Unless otherwise specified:
 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
4.	Addendum C Section H, Item (1)	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 Supp Plan Name
5.	Section C, Items (4)b. and (4)c.	Does the application include identification of the Non-SFA interest rate and the SFA interest, 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
6.	Addendum C 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. Enter N/A if the total projected benefit payments are the same as those used in the application approved under the interim final rule.	Yes No N/A	Yes	N/A - included as part of Template 4A Plan Name	N/A		N/A	N/A - included in Template 4A Plan Name
7.	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	SFA App Supp GCU 2-C.pdf	2	Identify here the name of the single document that includes all information requested in Section D of the SFA Filing Instructions (Checklist Items #7 through #10.b.).	Financial Assistance Application	SFA App Supp Plan Name
8.a.	Addendum C Section D, Item (1)	Does the application include a cover letter identifying the date the plan's application was approved under the interim final rule, as well as the approved SFA amount under the interim final rule as of the SFA measurement date?	Yes No	Yes	N/A - included as part of SFA App Plan Name	1		N/A	N/A - included as part of SFA App Plan Name
8.b.		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? 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
9.	Section D, Item (2)	Does the application include the name, address, email, and telephone number of the plan sponsor, the plan sponsor's authorized representative, and any other authorized representatives?	Yes No	Yes	N/A - included as part of SFA App Plan Name	4		N/A	N/A - included as part of SFA App Plan Name

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

v20220706p

APPLICATION CHECKLIST - SUPPLEMENTED

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

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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
10.a.	Addendum C Section D, Item (5)a.	If the projected employer contributions are different from those assumed in the application approved under the interim final rule, does the application include a detailed narrative description of the assumed future contributions (including assumed contribution rates) used to calculate the requested SFA amount under the final rule? Enter N/A if the projected employer contributions are unchanged from those assumed in the application approved under the interim final rule.	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
10.b.	Addendum C Section D, Item (5)b.	If the Plan Response to Checklist Item #10.a. is Yes, does the application include documentation described in § 4262.4(c)(3) of PBGC's SFA regulation that substantiates that the contributing rate increases that are excluded were agreed to on or after July 9, 2021? Enter N/A if the response to Checklist Item #10.a. is N/A.	Yes No N/A	N/A	N/A - included as part of SFA App Plan Name		Briefly describe the documentation included.	N/A	N/A - included as part of SFA App Plan Name
11.a.	Section E, Item (1)	Does the application include a fully completed Application Checklist - Supplemented, including the required information at the top of the Application Checklist (plan name, employer identification number (EIN), 3-digit plan number (PN), SFA amount approved under the interim final rule, and SFA amount requested under the final rule)?	Yes No	Yes	App Checklist Supp GCU 2-C.xlsx	N/A		Special Financial Assistance Checklist	App Checklist Supp Plan Name
11.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"), does the application include the fully completed Additional Information for Certain Events section of the general Application Checklist? 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		Special Financial Assistance Checklist	App Checklist Certain Events Plan Name

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

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APPLICATION CHECKLIST - SUPPLEMENTED

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

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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
12.a.	Addendum C Section E, Item (5)	Yes No	Yes	SFA Amount Cert Supp GCU 2-C.pdf	N/A		Financial Assistance Application	SFA Amount Cert Supp Plan Name
12.b.		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
13.	Section E, Item (10)	Yes No	Yes	Penalty GCU 2-C.pdf	N/A		Financial Assistance Application	Penalty Plan Name

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

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APPLICATION CHECKLIST - SUPPLEMENTED

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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
14.	Addendum C Section F, Item (1)	If the plan is not a MPRA plan, does the application include a reconciliation of the change in the total amount of SFA under the final rule from the total amount of SFA approved under the interim final rule, each as of the SFA measurement date? See Template 9 and its instructions for details on the reconciliation and information to be provided. Enter N/A if the plan is a MPRA plan. Does the uploaded document use the required filenaming convention?	Yes No N/A	Yes	Template 9 GCU 2-C.xlsx	N/A		Projections for special financial assistance (estimated income, benefit payments and expenses)	Template 9 Plan Name
15.	Addendum C Section G, Item (2)	If the plan is 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 requested amount of SFA under the final rule from the total amount of SFA approved under the interim final rule, each as of the SFA measurement date? See Template 9 and its instructions for details on the reconciliation and information to be provided. Enter N/A if the plan is a not a MPRA plan or if the plan is a MPRA plan using the present value method. Does the uploaded document 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 9 Plan Name
16.	Addendum C Section H, Item (2)	If the plan is 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 requested amount of SFA under the final rule from the total amount of SFA approved under the interim final rule, each as of the SFA measurement date? See Template 9 and its instructions for details on the reconciliation and information to be provided. Enter N/A if the plan is a not a MPRA plan or if the plan is a MPRA plan using the increasing assets method. Does the uploaded document 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 9 Plan Name

September 27, 2022

Pension Benefit Guaranty Corporation
1200 K Street, NW
Washington, DC 20005-4026

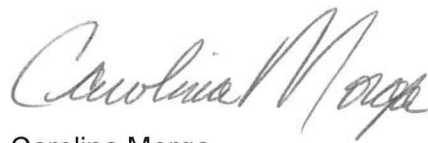
RE: Comerica Bank Wiring Instructions

Hello,

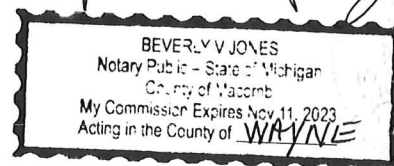
I have provided for you below the wiring instructions for Graphic Communications Union Local 2-C Retirement Benefit Plan:

Comerica Bank
ABA 072000096
Institutional Trust/Client Administration
[REDACTED]
FBO Graphic Communications Local 2-C
[REDACTED]

Thank you,



Carolina Morgia
Assistant Vice President
Comerica Bank
Phone 313-222-3290
Email cmorga@comerica.com



CC: Mary Mabe
Jay Tower

Comerica Bank

This document goes into effect August 8, 2022. Any applications filed before then would be under

TEMPLATE 4A

v20220701p

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. 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.

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
v20220701p	07/01/2022

the interim final rule.

x

x

x

x

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:	GCU 2-C Retirement Benefit Plan
EIN:	38-6047082
PN:	001
Initial Application Date:	09/21/2021
SFA Measurement Date:	06/30/2021
Last day of first plan year ending after the measurement date:	12/31/2021

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:	3.10%	Rate used in projection of non-SFA assets.
SFA Interest Rate Used:	3.04%	Rate used in projection of SFA assets.

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

Plan Interest Rate:	3.10%	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 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):	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):	September 2021	1.07%	2.68%	3.36%
1 month preceding month in which plan's initial application is filed, and corresponding segment rates:	August 2021	1.13%	2.70%	3.38%
2 months preceding month in which plan's initial application is filed, and corresponding segment rates:	July 2021	1.20%	2.73%	3.42%
3 months preceding month in which plan's initial application is filed, and corresponding segment rates:	June 2021	1.27%	2.77%	3.45%

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):		5.36%	This amount is calculated based on the other information entered above.
Non-SFA Interest Rate Calculation (lesser of Plan Interest Rate and Non-SFA Interest Rate Limit):	3.10%		This amount is calculated based on the other information entered above.
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.

SFA Interest Rate Limit (lowest average of the 3 segment rates plus 67 basis points):		3.04%	This amount is calculated based on the other information entered.
SFA Interest Rate Calculation (lesser of Plan Interest Rate and SFA Interest Rate Limit):	3.04%		This amount is calculated based on the other information entered above.
SFA Interest Rate Match Check:	Match		If the SFA Interest Rate Calculation is not equal to the SFA Interest Rate Used, provide explanation below.

TEMPLATE 4A - Sheet 4A-2

v20220701p

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:	
EIN:	
PN:	
SFA Measurement Date:	

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

SFA Measurement Date / Plan Year Start Date Plan Year End Date		PROJECTED BENEFIT PAYMENTS for:				
		Current Retirees and Beneficiaries in Pay Status	Current Terminated Vested Participants	Current Active Participants	New Entrants	Total

TEMPLATE 4A - Sheet 4A-3

v20220701p

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:	
EIN:	
PN:	
SFA Measurement Date:	

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
		N/A			

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:	GCU 2-C Retirement Benefit Plan
EIN:	38-6047082
PN:	001
MPRA Plan?	No
If a MPRA Plan, which method yields the greatest amount of SFA?	
SFA Measurement Date:	06/30/2021
Fair Market Value of Assets as of the SFA Measurement Date:	\$462,197
SFA Amount as of the SFA Measurement Date under the method calculated in this Sheet:	\$41,381,264
Projected SFA exhaustion year:	01/01/2049
Non-SFA Interest Rate:	3.10%
SFA Interest Rate:	3.04%

Meets the definition of a MPRA plan described in § 4262.4(a)(3)?

MPRA increasing assets method described in § 4262.4(a)(2)(i).
MPRA present value method described in § 4262.4(a)(2)(ii).

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.

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.

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 (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))
06/30/2021	12/31/2021	\$1,797	\$0	\$600	-\$1,293,782	-\$3,810,683	-\$97,959	-\$5,202,424	\$557,964	\$36,736,805	\$0	\$7,128	\$471,721
01/01/2022	12/31/2022	\$3,582	\$0	\$1,200	-\$2,511,932	\$0	-\$184,079	-\$2,696,011	\$1,079,306	\$35,120,100	\$0	\$14,697	\$491,200
01/01/2023	12/31/2023	\$3,570	\$0	\$1,200	-\$2,466,582	\$0	-\$189,061	-\$2,655,643	\$1,030,710	\$33,495,167	\$0	\$15,301	\$511,271
01/01/2024	12/31/2024	\$3,557	\$0	\$1,200	-\$2,409,515	\$0	-\$194,092	-\$2,603,607	\$982,025	\$31,873,584	\$0	\$15,923	\$531,950
01/01/2025	12/31/2025	\$3,543	\$0	\$1,200	-\$2,390,563	\$0	-\$199,240	-\$2,589,803	\$932,913	\$30,216,694	\$0	\$16,563	\$553,257
01/01/2026	12/31/2026	\$0	\$0	\$1,200	-\$2,369,679	\$0	-\$204,474	-\$2,574,153	\$882,753	\$28,525,294	\$0	\$17,169	\$571,626
01/01/2027	12/31/2027	\$0	\$0	\$1,200	-\$2,306,814	\$0	-\$209,869	-\$2,516,683	\$832,122	\$26,840,733	\$0	\$17,739	\$590,565
01/01/2028	12/31/2028	\$0	\$0	\$1,200	-\$2,259,039	\$0	-\$215,728	-\$2,474,767	\$781,483	\$25,147,449	\$0	\$18,326	\$610,091
01/01/2029	12/31/2029	\$0	\$0	\$1,200	-\$2,203,059	\$0	-\$221,330	-\$2,424,389	\$730,696	\$23,453,756	\$0	\$18,931	\$630,222
01/01/2030	12/31/2030	\$0	\$0	\$1,200	-\$2,162,678	\$0	-\$227,073	-\$2,389,751	\$679,679	\$21,743,684	\$0	\$19,555	\$650,978
01/01/2031	12/31/2031	\$0	\$0	\$1,200	-\$2,048,095	\$0	-\$236,378	-\$2,284,473	\$629,137	\$20,088,348	\$0	\$20,199	\$672,376
01/01/2032	12/31/2032	\$0	\$0	\$1,200	-\$1,976,038	\$0	-\$242,542	-\$2,218,580	\$579,717	\$18,449,485	\$0	\$20,862	\$694,438
01/01/2033	12/31/2033	\$0	\$0	\$1,200	-\$1,891,881	\$0	-\$248,516	-\$2,140,397	\$530,969	\$16,840,057	\$0	\$21,546	\$717,185
01/01/2034	12/31/2034	\$0	\$0	\$1,200	-\$1,804,064	\$0	-\$254,996	-\$2,059,060	\$483,158	\$15,264,155	\$0	\$22,251	\$740,636
01/01/2035	12/31/2035	\$0	\$0	\$1,200	-\$1,729,483	\$0	-\$259,422	-\$1,988,905	\$436,215	\$13,711,464	\$0	\$22,978	\$764,814
01/01/2036	12/31/2036	\$0	\$0	\$1,200	-\$1,627,651	\$0	-\$244,148	-\$1,871,799	\$390,651	\$12,230,316	\$0	\$23,728	\$789,742
01/01/2037	12/31/2037	\$0	\$0	\$1,200	-\$1,514,622	\$0	-\$227,193	-\$1,741,815	\$347,441	\$10,835,942	\$0	\$24,500	\$815,442
01/01/2038	12/31/2038	\$0	\$0	\$1,200	-\$1,404,321	\$0	-\$210,648	-\$1,614,969	\$306,827	\$9,527,800	\$0	\$25,297	\$841,939
01/01/2039	12/31/2039	\$0	\$0	\$1,200	-\$1,316,641	\$0	-\$197,496	-\$1,514,137	\$268,469	\$8,282,132	\$0	\$26,119	\$869,258
01/01/2040	12/31/2040	\$0	\$0	\$1,200	-\$1,213,077	\$0	-\$181,962	-\$1,395,039	\$232,267	\$7,119,359	\$0	\$26,965	\$897,423
01/01/2041	12/31/2041	\$0	\$0	\$1,200	-\$1,113,735	\$0	-\$167,060	-\$1,280,795	\$198,516	\$6,037,080	\$0	\$27,839	\$926,462
01/01/2042	12/31/2042	\$0	\$0	\$1,200	-\$1,026,207	\$0	-\$153,931	-\$1,180,138	\$167,022	\$5,023,965	\$0	\$28,739	\$956,401
01/01/2043	12/31/2043	\$0	\$0	\$1,200	-\$936,146	\$0	-\$140,422	-\$1,076,568	\$137,672	\$4,085,069	\$0	\$29,667	\$987,267
01/01/2044	12/31/2044	\$0	\$0	\$1,200	-\$851,113	\$0	-\$127,667	-\$978,780	\$110,497	\$3,216,786	\$0	\$30,624	\$1,019,091
01/01/2045	12/31/2045	\$0	\$0	\$1,200	-\$779,155	\$0	-\$116,873	-\$896,028	\$85,259	\$2,406,017	\$0	\$31,610	\$1,051,901
01/01/2046	12/31/2046	\$0	\$0	\$1,200	-\$704,184	\$0	-\$105,628	-\$809,812	\$61,817	\$1,658,023	\$0	\$32,627	\$1,085,729
01/01/2047	12/31/2047	\$0	\$0	\$1,200	-\$634,232	\$0	-\$95,135	-\$729,367	\$40,203	\$968,859	\$0	\$33,676	\$1,120,605
01/01/2048	12/31/2048	\$0	\$0	\$1,200	-\$575,088	\$0	-\$86,263	-\$661,351	\$20,204	\$327,712	\$0	\$34,757	\$1,156,562
01/01/2049	12/31/2049	\$0	\$0	\$1,200	-\$514,601	\$0	-\$77,190	-\$327,712	\$0	\$0	-\$264,079	\$32,151	\$925,834
01/01/2050	12/31/2050	\$0	\$0	\$1,200	-\$458,614	\$0	-\$68,792	\$0	\$0	\$0	-\$527,406	\$21,199	\$420,827
01/01/2051	12/31/2051	\$0	\$0	\$1,200	-\$373,021	\$0	-\$55,953	\$0	\$0	\$0	-\$428,974	\$6,947	\$0

**This document goes into effect August 8, 2022. Any applications filed before then would be under
TEMPLATE 9**

v20220701p

Reconciliation and Assumption Change for SFA Amount from Interim Final Rule Application

File name: *Template 9 Plan Name*, where "Plan Name" is an abbreviated version of the plan name.

Instructions for Addendum C for Supplemented Applications, Sections F, G and H

Provide a reconciliation of the change in the requested amount of SFA under the final rule as shown in Template 4A or Template 4B (whichever is applicable) from the total amount of SFA approved under the interim final rule as shown in Template 4 of the application approved under the interim final rule.

If the filer is proposing a change to the plan's employer contribution assumption to exclude contribution rate increases agreed to on or after July 9, 2021, as permitted under § 4262.4(c)(3) of PBGC's SFA regulation, provide a deterministic projection using the "basic method" of determining the SFA amount described in § 4262.4(a)(1) without reflecting the changed assumption, in the same format as sheet *4A-4 SFA Details .4(a)(1)* of Template 4A.

Additional instructions for each individual worksheet:

Complete sheet 9-1A, 9-1B, 9-1C, 9-1D, 9-1E, or 9-1F depending on the method used to calculate the requested SFA amount under the final rule, and depending on whether the filer is proposing a change to the plan's employer contribution assumption. See below for more explanation of which sheet is required.

Sheet

9-1A Section F, Item (1): Reconciliation - Summary for non-MPRA plans using the "basic method" under § 4262.4(a)(1) with no contribution increases agreed to on or after July 9, 2021

For Item number 1, show the SFA amount determined under the interim final rule, as shown in Template 4 of the application that was approved under the interim final rule.

For Item number 2, show the SFA amount determined under the final rule using the "basic method" with no assumption changes other than using the non-SFA and SFA interest rates, as shown in Sheet '4A-4 SFA Details .4(a)(1)' of Template 4A.

9-1B Section F, Item (1): Reconciliation - Summary for non-MPRA plans using the "basic method" under § 4262.4(a)(1) with contribution increases agreed to on or after July 9, 2021

For Item number 1, show the SFA amount determined under the interim final rule, as shown in Template 4 of the application that was approved under the interim final rule.

For Item number 2, show the SFA amount determined under the final rule using the "basic method" with no assumption changes other than using the non-SFA and SFA interest rates, and include the deterministic projection in Sheet 9-2 Recon Details.

For Item number 3, show the SFA amount determined under the final rule using the "basic method" reflecting the assumption change related to excluded contribution increases agreed to on or after July 9, 2021, as shown in Sheet '4A-4 SFA Details .4(a)(1)' of Template 4A.

9-1C Section G, Item (2): Reconciliation - Summary for MPRA plans for which the requested amount of SFA is determined under the "increasing assets method" described in § 4262.4(a)(2)(i) with no contribution increases agreed to on or after July 9, 2021

For Item number 1, show the SFA amount determined under the interim final rule, as shown in Template 4 of the application that was approved under the interim final rule.

For Item number 2, show the SFA amount determined under the final rule using the "basic method" with no assumption changes other than using the non-SFA and SFA interest rates, as shown in Sheet '4A-4 SFA Details .4(a)(1)' of Template 4A.

For Item number 3, show the SFA amount determined under the final rule using the "increasing assets method" with no assumption changes other than using the non-SFA and SFA interest rates, as shown in Sheet '4A-5 SFA Details .4(a)(2)(i)' of Template 4A.

9-1D Section G, Item (2): Reconciliation - Summary for MPRA plans for which the requested amount of SFA is determined under the "increasing assets method" described in § 4262.4(a)(2)(i) with contribution increases agreed to on or after July 9, 2021

For Item number 1, show the SFA amount determined under the interim final rule, as shown in Template 4 of the application that was approved under the interim final rule.

For Item number 2, show the SFA amount determined under the final rule using the "basic method" with no assumption changes other than using the non-SFA and SFA interest rates, and include the deterministic projection in Sheet 9-2 Recon Details.

For Item number 3, show the SFA amount determined under the final rule using the "basic method" reflecting the assumption change related to excluded contribution increases agreed to on or after July 9, 2021, as shown in Sheet '4A-4 SFA Details .4(a)(1)' of Template 4A.

For Item number 4, show the SFA amount determined under the final rule using the "increasing assets method" reflecting the assumption change related to excluded contribution increases agreed to on or after July 9, 2021, as shown in Sheet '4A-5 SFA Details .4(a)(2)(i)' of Template 4A.

9-1E Section H, Item (2): Reconciliation - Summary for MPRA plans for which the requested amount of SFA is determined under the "present value method" described in § 4262.4(a)(2)(ii) with no contribution increases agreed to on or after July 9, 2021

For Item number 1, show the SFA amount determined under the interim final rule, as shown in Template 4 of the application that was approved under the interim final rule.

For Item number 2, show the SFA amount determined under the final rule using the "basic method" with no assumption changes other than using the non-SFA and SFA interest rates, as shown in Sheet '4A-4 SFA Details .4(a)(1)' of Template 4A.

For Item number 3, show the SFA amount determined under the final rule using the "alternative present value method" with no assumption changes other than using the non-SFA and SFA interest rates, as shown in Template 4B.

9-1F Section H, Item (2): Reconciliation - Summary for MPRA plans for which the requested amount of SFA is determined under the "present value method" described in § 4262.4(a)(2)(ii) with contribution increases agreed to on or after July 9, 2021

For Item number 1, show the SFA amount determined under the interim final rule, as shown in Template 4 of the application that was approved under the interim final rule.

For Item number 2, show the SFA amount determined under the final rule using the "basic method" with no assumption changes other than using the non-SFA and SFA interest rates, and include the deterministic projection in Sheet 9-2 Recon Details.

For Item number 3, show the SFA amount determined under the final rule using the "basic method" reflecting the assumption change related to excluded contribution increases agreed to on or after July 9, 2021, as shown in Sheet '4A-4 SFA Details .4(a)(1)' of Template 4A.

For Item number 4, show the SFA amount determined under the final rule using the "alternative present value method" reflecting the assumption change related to excluded contribution increases agreed to on or after July 9, 2021, as shown in Template 4B.

9-2 Section F, Item (1): Reconciliation - Details for SFA amount under the Final Rule using the "basic method" with no assumption changes other than using the non-SFA and SFA interest rates

Sheet 9-2 is not required if all the assumptions used in determining the requested SFA amount under the final rule are the same as those used in the application that was approved under the interim final rule (except for the non-SFA and SFA interest rates).

See Template 4A instructions for Sheet 4A-4, except provide the projection used to determine the intermediate Item number 2 SFA amount from Sheets 9-1B, 9-1D, or 9-1F (whichever applies), under the "basic method" described in § 4262.4(a)(1) and before any assumption change related to excluded contribution increases agreed to on or after July 9, 2021. Unlike Sheet 4A-4, it is not necessary to explicitly identify the projected SFA exhaustion year in Sheet 9-2.

Version Updates (newest version at top)

Version	Date updated
v20220701p	07/01/2022

TEMPLATE 9 - Sheet 9-1A

v20220701p

Reconciliation - Summary for non-MPRA plans using the "basic method" under § 4262.4(a)(1) with no contribution increases agreed to on or after July 9, 2021

See Template 9 Instructions for Additional Instructions for Sheet 9-1A.

PLAN INFORMATION

Abbreviated Plan Name:	GCU 2-C Retirement Benefit Plan
EIN:	38-6047082
PN:	001
SFA Measurement Date:	06/30/2021
MPRA Plan?	No
If a MPRA Plan, which method yields the greatest amount of SFA?	

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	SFA amount under the Interim Final Rule	N/A	\$41,171,818
2	SFA amount under the Final Rule using the "basic method" with no assumption changes other than using the non-SFA and SFA interest rates	\$209,446	\$41,381,264

NOTE: No Recon Details sheets are required for any of the Item numbers.

From Template 4 of the application that was approved under the Interim Final Rule provisions.

From Sheet '4A-4 SFA Details .4(a)(1)' of Template 4A.

TEMPLATE 9 - Sheet 9-1B

v20220701p

Reconciliation - Summary for non-MPRA plans using the "basic method" under § 4262.4(a)(1) with contribution increases agreed to on or after July 9, 2021

See Template 9 Instructions for Additional Instructions for Sheet 9-1B.

PLAN INFORMATION

Abbreviated Plan Name:	GCU 2-C Retirement Benefit Plan
EIN:	38-6047082
PN:	001
SFA Measurement Date:	06/30/2021
MPRA Plan?	No
If a MPRA Plan, which method yields the greatest amount of SFA?	

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	SFA amount under the Interim Final Rule	N/A	\$41,171,818
2	SFA amount under the Final Rule using the "basic method" with no assumption changes other than using the non-SFA and SFA interest rates	\$209,446	\$41,381,264
3	SFA amount under the Final Rule using the "basic method" reflecting the assumption change related to excluded contribution increases agreed to on or after July 9, 2021	\$0	\$41,381,264

NOTE: A sheet with Recon Details is only required for Item number 2.

From Template 4 of the application that was approved under the Interim Final Rule provisions.

Show details supporting the SFA amount on Sheet 9-2.

From Sheet '4A-4 SFA Details .4(a)(1)' of Template 4A.

TEMPLATE 9 - Sheet 9-1C

v20220701p

Reconciliation - Summary for MPRA plans using the "increasing assets method" under § 4262.4(a)(2)(i) with no contribution increases agreed to on or after July 9, 2021

See Template 9 Instructions for Additional Instructions for Sheet 9-1C.

PLAN INFORMATION

Abbreviated Plan Name:	
EIN:	
PN:	
SFA Measurement Date:	
MPRA Plan?	
If a MPRA Plan, which method yields the greatest amount of SFA?	

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	SFA amount under the Interim Final Rule	N/A	
2	SFA amount under the Final Rule using the "basic method" with no assumption changes other than using the non-SFA and SFA interest rates	\$0	
3	SFA amount under the Final Rule using the "increasing assets method" with no assumption changes other than using the non-SFA and SFA interest rates	\$0	

NOTE: No Recon Details sheets are required for any of the Item numbers.

From Template 4 of the application that was approved under the Interim Final Rule provisions.

From Sheet '4A-4 SFA Details .4(a)(1)' of Template 4A.

From Sheet '4A-5 SFA Details .4(a)(2)(i)' of Template 4A.

TEMPLATE 9 - Sheet 9-1D

Reconciliation - Summary for MPRA plans using the "increasing assets method" under § 4262.4(a)(2)(i) with contribution increases agreed to on or after July 9, 2021

See Template 9 Instructions for Additional Instructions for Sheet 9-1D.

PLAN INFORMATION

Abbreviated Plan Name:	
EIN:	
PN:	
SFA Measurement Date:	
MPRA Plan?	
If a MPRA Plan, which method yields the greatest amount of SFA?	

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	SFA amount under the Interim Final Rule	N/A	
2	SFA amount under the Final Rule using the "basic method" with no assumption changes other than using the non-SFA and SFA interest rates	\$0	
3	SFA amount under the Final Rule using the "basic method" reflecting the assumption change related to excluded contribution increases agreed to on or after July 9, 2021	\$0	
4	SFA amount under the Final Rule using the "increasing assets method" reflecting the assumption change related to excluded contribution increases agreed to on or after July 9, 2021	\$0	

NOTE: A sheet with Recon Details is only required for Item 2.

From Template 4 of the application that was approved under the Interim Final Rule provisions.

Show details supporting the SFA amount on Sheet 9-2.

From Sheet '4A-4 SFA Details .4(a)(1)' of Template 4A.

From Sheet '4A-5 SFA Details .4(a)(2)(i)' of Template 4A.

TEMPLATE 9 - Sheet 9-1E

v20220701p

Reconciliation - Summary for MPRA plans using the "alternative present value method" under § 4262.4(a)(2)(ii) with no contribution increases agreed to on or after July 9, 2021

See Template 9 Instructions for Additional Instructions for Sheet 9-1E.

PLAN INFORMATION

Abbreviated Plan Name:	
EIN:	
PN:	
SFA Measurement Date:	
MPRA Plan?	
If a MPRA Plan, which method yields the greatest amount of SFA?	

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	SFA amount under the Interim Final Rule	N/A	
2	SFA amount under the Final Rule using the "basic method" with no assumption changes other than using the non-SFA and SFA interest rates	\$0	
3	SFA amount under the Final Rule using the "alternative present value method" with no assumption changes other than using the non-SFA and SFA interest rates	\$0	

NOTE: No Recon Details sheets are required for any of the Item numbers.

From Template 4 of the application that was approved under the Interim Final Rule provisions.

From Sheet '4A-4 SFA Details .4(a)(1)' of Template 4A.

From Template 4B.

TEMPLATE 9 - Sheet 9-1F

Reconciliation - Summary for MPRA plans using the "alternative present value method" under § 4262.4(a)(2)(ii) with contribution increases agreed to on or after July 9, 2021

See Template 9 Instructions for Additional Instructions for Sheet 9-1F.

PLAN INFORMATION

Abbreviated Plan Name:	
EIN:	
PN:	
SFA Measurement Date:	
MPRA Plan?	
If a MPRA Plan, which method yields the greatest amount of SFA?	

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	SFA amount under the Interim Final Rule	N/A	
2	SFA amount under the Final Rule using the "basic method" with no assumption changes other than using the non-SFA and SFA interest rates	\$0	
3	SFA amount under the Final Rule using the "basic method" reflecting the assumption change related to excluded contribution increases agreed to on or after July 9, 2021	\$0	
4	SFA amount under the Final Rule using the "alternative present value method" reflecting the assumption change related to excluded contribution increases agreed to on or after July 9, 2021	\$0	

NOTE: A sheet with Recon Details is only required for Item 2.

From Template 4 of the application that was approved under the Interim Final Rule provisions.

Show details supporting the SFA amount on Sheet 9-2.

From Sheet '4A-4 SFA Details .4(a)(1)' of Template 4A.

From Template 4B.

