

Comment Submitted by: DeAna M. Boren on April 25, 2007 via regulations.gov

General Comment: I am the HR Administrator at Cooper Bussmann, a division of Cooper Industries, a self-insured, self-administrated corporation located in Houston, TX. Our 401(k) plans are governed by ERISA.

Diversified Investment Advisors, the 3rd party administrator of our defined contribution and defined benefit plans, provides full disclosure of all fees to participants. The disclosure is noted in quarterly statements that are either mailed to participants or sent electronically if elected by the participant. Our employees use Diversified's website to maintain their 401(k) accounts and to make plan changes. Anytime a plan participant transfers out of a Vanguard Dev Mkts fund, the website provides a warning notifying the participant about a redemption fee if the amount was held in the fund 60 calendar days or less. It even notifies the participant that the fee is paid directly to the fund, not to Diversified. If a participant elects a service that has a fee, such as the Diversified Managed Account, he or she is notified of the fee prior to confirming the election. That fee is disclosed on the quarterly statement as well. As a company, we hold Diversified Investment Advisors responsible for providing disclosure of all fees to plan participants. However, to maintain employee relations, I notify new hires of the fees during orientation, and the fees are also provided when they enroll in the program and services on the Diversified website. When I do articles about the 401(k) program in our company newsletter, I also provide fee information if it is applicable.

Attached is one of the information sheets that Diversified provided last Fall when they conducted plan benefit seminars for our employees. Each employee received a copy of this document. I also provide a copy to our new hires during orientation.

Sincerely,

DeAna M. Boren
HR Administrator
Cooper Bussmann
Goldsboro, NC

Building Your Retirement Portfolio with Diversified ... Today and Through Retirement

A PATH FOR EVERY INVESTOR

1



2

Understand the Investment Services and Tools

SERVICE You sign up for the service online or by phone.

ONLINE TOOL You go to www.divinvest.com to use this self-service tool.

Personalized Investment Allocation

Professional Investment Management

The investment management of your defined contribution/401(k) account will be responsive to changing market conditions and/or changes in your personal investment goals or situation.

Automatic Rebalancing of Your Account

Automatic rebalancing means that your defined contribution/401(k) account will be rebalanced for you each quarter to ensure that your investment mix is in line with your targeted goals.

Monitoring Your Progress

When I turn on this service, can I monitor my progress?

Cost

Is there an additional service fee?

3

How to Sign Up or Get More Information

"I want a professional investment manager."

I want to turn over the investment decisions for my retirement plan account to a professional investment management service that considers information I provide about my total financial picture. I want a personalized asset allocation strategy that will automatically adjust my account, as needed, using the funds in my retirement plan.

Diversified Managed Account

SERVICE

A comprehensive, professional investment management service where your retirement plan account is invested in the funds available in your plan based on a personalized asset allocation strategy matched to your needs by Ibbotson Associates, a recognized expert in developing asset allocation strategies for retirement investors. You provide the financial information that you want considered.

Yes. This service will manage your defined contribution/401(k) account based on information you provide about your total financial picture.

Yes. Ibbotson Associates will review the appropriateness of your investment allocation strategy periodically to ensure that it continues to meet your changing goals over your lifetime.

Yes. Rebalancing occurs initially upon subscription to the service and then every 90 days thereafter.

Yes. Go to www.divinvest.com and click on "Account Overview" or go to the "Retirement Planning" section to view your "Control Panel" and see current account information or to update your profile and other important personal financial information.

Yes. The annual service fee is 0.25% on the retirement assets that are allocated to the service. This fee accrues daily, is deducted from your account monthly and is reflected as a fee on your quarterly statement.

For example, assuming \$10,000 of retirement plan assets invested in the Diversified Managed Account for the entire year, the annual service fee is \$25.

Sign up: Log on to your account at www.divinvest.com to turn on the service – click on "Diversified Managed Account" under new features on the Welcome Page or on the "Account Overview" page. Additional information regarding the fees and other terms and conditions applicable to the Diversified Managed Account is available in the Managed Account Agreement, which you must accept to subscribe to this service. You can turn the service off at any time by going to the Diversified Web site. If you elect to turn the service back on, you will need to wait 90 days.

Questions: Call 800-755-5801 to speak with a Diversified Representative.

"I want my investment decision simplified."

I want the asset allocation for my retirement plan account to be based on my targeted year of retirement. I want the asset allocation mix in my retirement plan account to be adjusted automatically, as needed.

PortfolioXpress™

SERVICE

Over the course of your lifetime, this asset allocation service will automatically rebalance your retirement plan account to a target mix of the funds in your retirement plan based on an allocation tailored to your years to retirement.

Yes. This service will provide an asset allocation strategy for your defined contribution/401(k) account based on the year that you plan to retire.

Yes. The asset allocation mixes developed by Diversified Investment Advisors based on the funds in your plan will be responsive to changes in your targeted year of retirement.

Yes. Rebalancing occurs initially upon subscription to the service and then every 90 days thereafter.

Yes. Go to www.divinvest.com to view your current investment mix and the progression of your investment mixes to date through retirement.

No

Sign up: Log on to your account at www.divinvest.com to turn on the service. Click "PortfolioXpress" under "Transactions." By signing up for PortfolioXpress, you are agreeing to each of the asset allocation mixes and each of the automated rebalancing transactions that will take place over time within your account as you approach retirement. You can turn the service off at any time by going to the Diversified Web site.

Questions: Call 800-755-5801 to speak with a Diversified Representative.

"I want to create and manage my investment strategy."

I feel comfortable making my own investment decisions for my retirement plan account and prefer to retain total control of my account management. I want to establish and maintain an asset allocation strategy composed of the funds in my retirement plan. I can turn on the Auto Rebalance Service available through Diversified Investment Advisors, enter my selected investment allocations and have my portfolio automatically rebalanced.

Sample Investment Mixes

TOOL

Your "Plan of a Lifetime" booklet includes Sample Investment Mixes composed of the funds available in your plan. You can also view your Sample Investment Mixes by going to www.divinvest.com. These samples are designed to provide you with sample asset allocations, which you may select based on your personal risk tolerance.

Yes. You can manage your defined contribution/401(k) account based on general assumptions and the number of years you have until retirement.

No. You will need to make your investment allocation changes as needed. However, the Sample Mixes offer you sample portfolio allocations based on general assumptions.

No. Unless you choose to receive automatic rebalancing on your account by turning on the free Auto Rebalance Service. With this service you may enter your selected investment allocation.

Sample Investment Mixes are included in your education booklet, available online and sent out with your Diversified statement each quarter. Go to www.divinvest.com and click on "My Account."

No

How to use this tool: See your "Plan of a Lifetime" booklet or go to www.divinvest.com and log on to your account.

Questions: Call 800-755-5801 to speak with a Diversified Representative.

RetireTrack™

ONLINE TOOL

An online tool that you can use to develop your personalized investment strategy based on your total financial picture. This tool created by Diversified Investment Advisors enables you to model different savings and investment strategies and see the impact they might have on achieving your retirement savings goals.

Yes. You can model different savings and investment strategies for your defined contribution/401(k) account that can be personalized based on your total financial picture.

No. You will need to make your investment allocation changes, as needed. However, the tool can offer you sample portfolio allocations based on general assumptions.

No. Unless you choose to receive automatic rebalancing on your account by turning on the free Auto Rebalance Service. With this service you may enter your selected investment allocation.

Go to www.divinvest.com to review and update personal information and model alternative investment and savings strategies.

No

How to use this tool: Log on to your account at www.divinvest.com after 1/1/07 and click on "RetireTrack" under "Retirement Planning."

Questions: Call 800-755-5801 to speak with a Diversified Representative.