From: BLACK, JOHN [mailto:jblack@cfiemail.com]

Sent: Thursday, March 16, 2017 4:46 PM **To:** EBSA.FiduciaryRuleExamination

Subject: RIN 1210-AB79

RE: RIN 1210-AB79

To Whom It May Concern:

Thank you for the opportunity to submit comments relating to the proposed extension of the Conflict of Interest rule.

The real issue as I see it is not the requirement of a fiduciary standard. We are already held to a higher standard by existing regulations and further strengthened by the culture of our firm. Our firm demands that our client's best interests are always served. However, I am strongly opposed to the bureaucratic approach outlined in the rule.

I believe that as this bill now stands, it creates overlapping regulations and will certainly increase the potential for litigation. Please take the time to thoroughly analyze the affect that this bill will have on the investor. The 60 day review period granted may not be a sufficient amount of time to adequately complete the task at hand, as there is so much to consider.

As the rule is currently written, it would increase the cost to investors, limit industry competition by promoting consolidation, favor passive investment strategies for all investors, result in disruptions within the retirement services industry and ultimately adversely affect the ability of retirement investors to gain access to retirement products, services, and professional financial advice.

I strongly agree with your proposal to delay implementation of the rule. Thank you for your consideration.

Respectfully,

John Black

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