Tuesday, March 7, 2017

Mr. Edward Hugler
Acting Secretary
US Department of Labor
200 Constitution Ave. NW
Washington, DC 20210

Dear Mr. Hugler,

I am writing to express my opposition to the Department of Labor's Fiduciary Rule. The rule will replace an objective standard, the "Suitability" rule with a subjective standard "best interest" rule (Who decides what is "best"?) This subjective standard is a gift to the trial bar, which they will not hesitate to exploit, driving up compliance costs, which will be borne by consumers, either through higher expenses, or by being priced out of the market for financial advice. Not only will cost increase, custom tailored advice will be greatly reduced, and investment advice homogenized, as firms move to do what they can to protect themselves from lawsuits. Cost will be further driven up by the industry consolidation sure to follow, as smaller firms are unable to keep pace with the ever growing compliance leviathan. The Fiduciary rule is also a landmine loaded with of conflicts of interest between financial services firms (who are only too happy to charge the high and recurring fees encouraged by the rule, in lieu of low or in some cases non-existent commissions) and their customers. For all these reasons and more, I urge you to delay the applicability date of all of the Rule's provisions and exemption conditions, as well as support efforts to repeal the Rule.

Sincerely,

Kristy Gillham

Kristy Gillham

Citizen/Investor