

To: EBSA.FiduciaryRuleExamination
Subject: RIN 1210-AB79 Comment

Dept. of Labor, Office of Regulations and Interpretations
Attn: Proposed Definition of Fiduciary Regulation, Room N-5655
U.S. Department of Labor
200 Constitution Avenue, N.W.
Washington DC 20210

Dear Dept. of Labor Office of Regulations and Interpretations:

Ladies and Gentlemen:

I write to encourage the Department of Labor to delay the implementation of the regulation which redefines the term "fiduciary" under section 3(21) of ERISA and section 4975(e) of the Internal Revenue Code of 1986. I would like to point out that a delay is in the interest of participants and beneficiaries and would allow much needed time for further government review.

To ensure our clients are prepared for the new rule, we need a delay. Our firm has spent many dollars and staff hours revising our policies and procedures necessary to make the enormous shift required by the new rule. In short, this changes the way we do business, and we must have time to explain this to our clients. Because of the uncertainty regarding this rule, more time is needed to advise clients fully of the ways in which the rule will affect the products and services available to them. Anything less would not allow us to meet the level of customer service excellence we seek to provide.

I strongly support a delay in the Applicability Date. No retirement investor's interest will be served if the Fiduciary Rule goes into effect before we have certainty on the products and services that can be provided under the final rule.

Please grant the delay as soon as possible.

Sincerely,