As of: 7/6/17 5:08 PM
Received: July 06, 2017
Status: Pending_Post
Tracking No. 1k1-8xd8-q3fu
Comments Due: July 21, 2017
Submission Type: Web

PUBLIC SUBMISSION

Docket: EBSA-2017-0004
Request for Information on the Fiduciary Rule and Prohibited Transaction Exemptions

Comment On: EBSA-2017-0004-0001
Fiduciary Rule and Prohibited Transaction Exemptions; Request for Information

Document: EBSA-2017-0004-DRAFT-0007
Comment on FR Doc # 2017-14101

Submitter Information

Name: Dawn Emmons
Address:
1333 El Camino Drive, P.O. Box 937
Pekin, IL, 61554
Email: dawn@anbc.com
Phone: 800-228-2926

General Comment

Comments in response to question 1 (relating to extending the January 1, 2018, applicability date of certain provisions) and question 8 regarding advisers being compensated.

Thank you for allowing comments regarding extending the January 1, applicability date of certain provisions. I feel that at this time the date should be delayed until more in-depth analysis can be done on each product that has been placed in this rule.
As noted in the comments on the Alternative Streamlined Exemptions many questions have come up on how to handle certain investment vehicles.

In regards to question 8 on the Alternative Streamlined Exemptions the question came up on how an adviser would be compensated on fixed and fixed indexed annuities. In the current structure the adviser is compensated by the insurance company and the commission is not pulled out of the clients premium. How can this not be fiduciary? Under the new rule going into effect, on a fee bases system, the fee would be charged and the burden would be placed on the client.Fees would coming out of the principal and in return the client looses. I feel that Fixed and Fixed Indexed annuities should be placed under the PTE 84-24 rule not the BICE rule. Suitability guidelines are already in place with Fixed and Fixed Indexed annuities. Each state is already governing these products. Please keep them status quo not DOL enforcement.

Again, thank you for allowing me to comment on the Delay of the Fiduciary Rule and Prohibited Transactions Exemptions rule.