

# PUBLIC SUBMISSION

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**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

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## Submitter Information

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## General Comment

My opinion as an advisor in the BD space seems to be in the minority. I have always viewed my practice through the prism of my clients first, my company and myself as secondary. As a transactional broker I remain committed to that philosophy and would have no problem with disclosure of fees, commissions, and potential conflicts. However it seems that the BIC contract is an onerous exercise and we could do better with a simpler format. When I do business as an RIA Representative we abide by the brochure rule. I would highly recommend that, that method be applied across all lines of business. It accomplishes the goal of disclosure, and fiduciary responsibility without the clutter of immense paperwork and documentation of analysis.