NAIFA

NATIONAL ASSOCIATION OF
INSURANCE AND FINANCIAL ADVISORS

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Capitol Hill Office:
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May 8, 2015

Employee Benefits Security Administration Via: http://www.regulations.gov
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210

Re: Comment Period for Conflict of Interest Rule and Related Exemptions

Ladies and Gentlemen:

The National Association of Insurance and Financial Advisors (NAIFA) respectively requests a 45-day extension of the comment period for the U.S. Department of Labor's (DOL) Notice of Proposed Rulemaking (and the accompanying exemptions and modifications to existing exemptions) defining the term "fiduciary" as a result of giving investment advice to a plan or its participants or beneficiaries, including individual retirement accounts (IRA).

NAIFA is one of the nation's oldest and largest associations representing the interests of insurance professionals from every congressional district in the United States. NAIFA members assist consumers by focusing their practices on one or more of the following: life insurance and annuities, health insurance, employee benefits, multiline, and financial advising and investments. NAIFA's mission statement includes promoting the ethical conduct of its members.

Recently NAIFA joined other associations in requesting that the DOL extend the comment period to allow the associations sufficient time to carefully analyze and understand the practical implications of the proposed rule. NAIFA is supplementing that joint request with this specific request for a 45-day extension (120-days total) to the comment period so that we can submit useful and thoughtful comments based upon the input we will seek from our large membership.

The re-proposed rule is complex in size and in scope. We will need to communicate the rule's meaning and significance in more simplified terms to our members, so they can assess how it will impact their current clientele and those still seeking affordable access to advice and education as they ready themselves for retirement. While this is a top priority for NAIFA, it is also one that requires significant time and coordination. Once we have drafted an explanation of the complex rule and the accompanying new prohibited transaction exemptions, modifications to the existing exemptions and possible new third

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"low-fee" exemption, NAIFA will ask for feedback from our Board of Trustees and committees of jurisdiction.

After receiving required feedback from this initial group, NAIFA will prepare a survey for our total membership to gather the kind of information and data the DOL will need as it seeks to improve upon the proposed regulation. Again, this is a time-consuming process, but one necessary to providing thoughtful and useful comments on the rule's potential impact on the middle-market American families NAIFA members serve.

In addition to feedback from NAIFA members, we will seek guidance and information from our corporate partners, who as financial institutions will be subject to very significant changes to their current business practices. NAIFA members will be directly impacted by the decisions financial institutions make as they seek to comply with new obligations placed on them if the rule is enacted.

With over 10,000 people reaching retirement age each day for the next 16 years, there is a very large demographic of retirees and future retirees in need of affordable, professional advice and education. It is critically important that the DOL understand the impact of the rule on the very families it seeks to protect. So that NAIFA may help DOL understand that impact, we believe it is critically important that the department give us sufficient time to collect data and provide informative comments.

Respectfully,

Diane R. Boyle
Senior Vice President, Government Relations
National Association of Insurance and Financial Advisors