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Sent: Wednesday, September 02, 2015 4:00 PM
To: EBSA, E-ORI - EBSA
Cc: Charlie Murphy
Subject: Options In Retirement Accounts

DOL/EBSA,

I have been retired for more than 10 years and manage my own investments. Most of my investments are in stocks in an IRA. The IRA stock portfolio typically includes shares in 15 to 20 listed companies. Most pay dividends; the annual dividend yield for the entire portfolio is above 3%.

I regularly write out of the money covered calls on the stocks in my IRA. The purpose is to add to the dividend yield by realizing the income from the call premium. In most years I have been able to realize an additional 3 to 4% from covered call writing. This is very important particularly these days as the yield on interest-earning assets is so poor.

I would like to be able to buy calls and sell puts in the IRA but current regulations prohibit that. It is my money, after all. I saved it, I invest and I protect it. If I make a bad choice on the purchase of a stock and lose money, that's my responsibility. Why should that be different for puts and calls?

As I am over 72 years of age I must make annual withdrawals from my IRA. I need these monies to cover my living expenses. In order to buy calls I must withdraw extra funds from my IRA, which will be subject to income tax, and deposit the funds in a non-retirement account where I have more freedom. If I wished to sell put options I would have to withdraw large sums from my IRA in order to secure the put contract; I am not willing to do that because of the tax consequences, so I am effectively barred from that choice. If I was able to do that in my IRA, the stocks would provide the security for the put.

I hope that you will consider these reasons and rule in favor of liberalizing IRA account transactions.

Thank you,

Charles Murphy