From: Ron Surz [mailto:ron@targetdatesolutions.com]

**Sent:** Tuesday, June 03, 2014 9:37 AM

To: EBSA, E-ORI - EBSA

Subject: Attention: RIN 1210-AB38; Target Date Disclosure

Dear Department of Labor,

We've written a book about target date funds, attached. The book is written from three distinct perspectives that you can identify with. I write from the perspective of a fiduciary, as a 3(38) sub-advisor. My co-author, John Lohr, sees TDFs from the perspective of an ERISA attorney, and our third co-author, Mark Mensack, looks at TDFs through the eyes of a professional ethicist.

Chapters pertaining to glide path disclosures are as follows:

## To or Through

A distinction without a difference.

## **Current Practices**

Most fiduciaries choose their bundled service provider because of convenience and familiarity, rather than excellence. See <u>Likely lawsuits</u>

## **Statement of Investment Policy**

The purpose of this statement is to document your goals and how you plan to achieve them.

Each chapter is approximately 7 pages, so they're brief and to the point. The book was recently featured as the <u>lead article in ThinkAdvisor</u> on-line magazine, written by Editor-in-Chief Gil Weinreich.

Ronald Surz, President Target Date Solutions 78 Marbella San Clemente, CA 92673 949/488-8339 <u>www.TargetDateSolutions.com</u> especially our <u>Book</u> and the <u>Fiduciary Corner</u> ( Please see the videos at <u>Interview</u>, <u>Bloomberg</u> and <u>Xtranormal</u>, and articles at <u>DOL Tips</u> and <u>Fiduciary Guide</u>)

