

From: Todd Heller [mailto:theller@hellerpension.com]
Sent: Thursday, September 18, 2014 1:28 PM
To: EBSA, E-ORI - EBSA
Subject: RIN 1210-AB59 (Brokerage Windows RFI)

To Whom This May Concern,

My 40-year old firm provides third party administration services to many smaller qualified retirement plans, including 401(k) plans. We do not provide any investment-related services. Some of our smaller clients utilize brokerage account platforms as the sole investment option. This is due both to the greater investment options available, as well as the lower participant costs as compared to many of the available recordkeeping platforms with layered fees, especially for newer "start-up" plans.

I understand that the DOL may implement regulations affecting these types of investment platforms. I would be happy to discuss the related issues and our experience with these arrangements.

Please let me know if I can be of assistance.

Best regards,

Todd

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