



July 2, 2020

Mr. Joe Canary, Director
Office of Regulations and Interpretations
Employee Benefits Security Administration - Room N-5655
U.S. Department of Labor
200 Constitution Avenue NW
Washington, DC 20210

Re: Financial Factors in Selecting Plan Investments Proposed Regulation (RIN 1210-AB95)

Dear Director Canary:

The Interfaith Center on Corporate Responsibility (ICCR) is a coalition of more than 300 institutional investors collectively representing over \$500 billion in invested capital. Our members are a cross section of religious investors, foundations, asset managers, pension funds, and other long-term institutional investors, many who will be affected by the proposed regulation, *Financial Factors in Selecting Plan Investments* (RIN 1210-AB95). I write to request an extension of the comment period of this proposal from 30 days to 120 days. Given the complexity of the rule and proposed changes, and the potential magnitude of those changes, the 30 day comment period is far too short. This short window is particularly difficult given the current Covid-19 crisis worldwide.

We also request that a public hearing be held virtually (in accordance with CDC safety recommendations) in order to give those potentially affected by this ruling a chance to voice concerns and submit comments for the record.

In order to address these concerns, we respectfully request an extension of the comment period to 120 days. Please don't hesitate to contact me with any questions.

Sincerely,

A handwritten signature in black ink, consisting of a series of loops and curves, representing the name Josh Zinner.

Josh Zinner
CEO
Interfaith Center on Corporate Responsibility
jzinner@iccr.org