



October 11, 2022

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Office of Exemption Determinations
Employee Benefits Security Administration
U.S. Department of Labor
200 Constitution Avenue NW
Washington, DC 20210

Re: Request to Testify During the Upcoming Hearing on DOL's Proposed Amendments to Prohibited Transaction Class Exemption 84-14, the QPAM Exemption (EBSA-2022-0008)

Dear Sir or Madam:

The SPARK Institute, Inc. hereby requests the opportunity to testify at the upcoming hearing on the Department of Labor's proposed amendments to Prohibited Transaction Class Exemption 84-14 ("the QPAM Exemption").

We expect that Michael Hadley, Partner, Davis & Harman LLP, will testify on behalf of the SPARK Institute. Mr. Hadley's contact information is mlhadley@davis-harman.com, 202-662-2298, 1455 Pennsylvania Avenue, NW, Suite 1200, Washington, DC 20004.

Our testimony will address and expand upon the issues discussed in the SPARK Institute's comment letter filed October 11, 2022. Thus, we expect to address the proposed requirements regarding investment management agreements, the new "written ineligibility notice" process, the rules regarding manager discretion, and the winding down period, among other issues.

Sincerely,

Tim Rouse
Executive Director