INVESTACORP®

VIA ELECTRONIC MAIL (e-ORI@dol.gov)

To: Office of Regulations and Interpretations
Employee Benefits Security Administration
Attn: Conflict of Interest Rule
U.S. Department of Labor
200 Constitution Avenue NW
Washington, DC 20210

RE: *Proposed Conflict of Interest Rule Proposals-**RIN 1210-AB32***

Investacorp, Inc. (IC) thanks you for the opportunity to comment on the Department's proposed amendments to the definition of a "fiduciary" and Retirement Investment Advice Conflict of Interest Rule Proposal.

IC is an independent financial services firm, headquartered in Miami, Florida, with approximately 475 independent registered representatives. Approximately half of our registered representatives are dually registered with our corporate SEC Registered Investment Advisory firm, Investacorp Advisory Services, Inc., therefore allowing them the flexibility to offer their clients investment opportunities tailored specific to their individual needs through either the broker dealer or the RIA.

While IC can support a standard of care that will require all investment professionals offering investment advice to retail clients to adhere to, this proposed standard of care should be very carefully examined to ensure that it is in the best interests of the investor.

The rule as proposed will create higher costs and make it more difficult for clients to receive individualized investment advice from a trusted advisor. In order to comply with the disclosure requirements detailed in the Best Interest Contract Exemption (BICE), IC will have to bear substantial initial and ongoing costs. These costs are probably to find its way down to the independent advisor and ultimately passed through to the individual client level, therefore increasing the overall cost to the client to receive investment advice.

Additionally, by excluding products such as Real Estate Investment Trusts and Business Development Companies in the definition of an "Asset", the proposed rule limits the ability to products that may provide for greater overall portfolio diversification for investors.

Investors may be easily confused due to the separate set of standards being applied to broker dealers that is vastly different than the fiduciary standard applicable to investment advisors. Customers with varying account registrations for accounts serviced by the same financial advisor may have a hard time grasping the differences in the standard of care that is relevant to each account. The Department is urged to apply a uniform standard of care that will be applicable to all accounts to limit the complexity and confusion that exists based upon the rule as proposed.

As a member of the Financial Services Institute (FSI), IC fully supports the alternative uniform fiduciary standard proposed in FSIs comment letter on this matter. We believe that this alternative uniform fiduciary standard, which will be applicable to all investment professionals and all types of accounts, makes it easier for investors to receive high-quality, individualized investment advice from a trusted advisor, and provides retail investors with a clear and easy to understand standard of care.

Again, thank you for the opportunity to express our comments regarding this proposal. If you have any questions, please feel free to contact me at (305) 557-3000.

Respectfully,

Marcus Arneaud
Executive Vice President/Chief Compliance Officer
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