

Further delay of a rule that protects investors and retirees should not be considered, pursued, or granted. As a director in the industry, I have seen first-hand the greed and non-fiduciary actions, thinking, and planning that comes from a commission-paid revenue model: sales reign supreme, not the best interest of clients. Countless times, I have seen advisors, who have to only be licensed, enter a room and use the talking points given to them by large insurance or financial institutions to put clients in an annuity or financial product that can tie-up their money for 6 – 16 years or significantly underperform the market. Some of the products are so complex that they come with a 40+ page binding contract or 100+ page prospectuses to discuss a portfolio's underlying holdings. For an unsophisticated investor who is trusting their advisor, why is it so bad to have embedded accountability and protections like a best interest contract that gives clients the peace of mind that their advisor has accountability for the recommendations they make? I don't think this is a bad or crazy idea; in fact, it seems reasonable and fair. The current suitability standard is at best "fluffy". Many times, for example, clients are put into fixed index annuity contracts with a fraction of the liquid assets advisors claim. Additional claims that money is protected and no losses from market performance can be incurred is also misleading since clients can stand to gain 0%, pay excess withdrawal penalties, or pay rider fees on riders that were selected for them by the very advisor who sold them on 0% losses. It's not that some of these financial products are not appropriate for the right investor – it's that a majority of clients that leave the protection of a plan sponsor and choose to rollover their qualified dollars are being lured by financial professionals who have no fiduciary accountability, and the options for recourse by clients is limited to nonexistent since they enter a binding contract. What binds the advisor? If advisors are truly acting in the best interest of clients, then this conflict of interest rule should be a nonissue. A delay is the beginning steps to a repeal. If the current administration is truly for Main Street, then it should ignore Wall Street's request for a delay and do right by those who want their retirement dollars protected. If plan sponsors have to uphold the highest level of prudent investing, then so should advisors who transfer or rollover those same qualified dollars but do so by considerably limiting the protection of client assets and their recourse options since they do not have the fiduciary accountability to uphold the same standard as a plan sponsor.