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Definition of the Term "Fiduciary"; Conflict of Interest Rule—Retirement

Investment Advice

Comment On: EBSA-2010-0050-3491

Definition of Term Fiduciary; Conflict of Interest Rule-Retirement Investment

Document: EBSA-2010-0050-DRAFT-13006

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General Comment

The rule , as written , creates a significant loss of product availability for many small investors /savers . The rule forces consolidation to a securities platform ,threatening fixed and fixed index product availability . Insurance fixed products are well-governed by state departments of insurance . The satisfaction rate is 99.8% . The rule will lead to the loss of thousands of jobs among IMO's (Independent Marketing Organizations)