PUBLIC SUBMISSION

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Definition of an Investment Advice Fiduciary

Comment On: EBSA-2023-0014-0003

Hearings, Meetings, Proceedings etc.: Retirement Security Rule; Definition of an Investment Advice Fiduciary and Associated Prohibited Transaction Exemption Amendments

Document: 1210-AC02 request 0043 Winston 11292023

Submitter Information

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General Comment

Attached is a file asking for permission for Janice C. Winston to testify. She is also part of a request to testify with Norman P. Stein on behalf of the Pension Rights Center. This request to testify individually is made in case it is not possible for two witnesses to appear on behalf of an organization. If it is possible, then this request is moot.

Attachments

Requet of Janice C. Winston to Testify on Investment Advice Fiduciary Proposed Rule

Janice C. Winston, a retired individual, requests an opportunity to comment on the Department of Labor's proposed rule entitled "Retirement Security Rule: Definition of an Investment Advice Fiduciary," and proposed changes to related exemptions to the prohibited transaction rules under ERISA.

Please note that the Pension Rights Center has submitted a request for me to testify along with Norman P. Stein on its behalf. My request to testify as an individual is being made as a contingency in case it is not possible for two individuals to testify on behalf of the same organization. If it is possible for both Professor Stein and I to testify together on behalf of the Pension Rights Center, I hope that you could schedule my individual testimony immediately following that of the Pension Rights Center.

Please note that I will not be available on the morning of December 12th or 14th and will not be available between 2:00 and 3:00 on the afternoon of the 13th. Below is the information you requested for individuals submitting a request to testify:

(1) Information on the Person Who Would Testify:

Name: Janice C. Winston

Address: 266 East Johnson Street, Philadelphia, PA19144

Phone Number: (215) 806-0300

- (2) The testimony under this request will represent my own views.
- (3) The Requester has not yet submitted written comments.

Respectfully submitted,

Janice C. Winston