

# PUBLIC SUBMISSION

<b>Received:</b> November 29, 2023 <b>Tracking No.</b> lpk-mffm-x450 <b>Comments Due:</b> November 29, 2023 <b>Submission Type:</b> Web
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**Docket:** EBSA-2023-0014  
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 0044 Pension Rights Center Stein 11292023

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## Submitter Information

**Email:** nps32@drexel.edu  
**Organization:** Pension Rights Center

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## General Comment

We attempted to submit a request to testify on Monday but have not received acknowledgement, so are submitting again. We will both download our request and include it here: The Pension Rights Center, a non-profit organization that advocates for consumer interests in retirement plans, 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. Below is the information you requested for individuals and organizations submitting a request to testify:

(1) Information on the Person Who Would Testify

Name of Person to Testify: Norman P. Stein

Title of Person to Testify: Senior Policy Adviser and Acting Legal Director

Name of Organization: Pension Rights Center

Address of Person to Testify: 4542 NE 94th Street, Seattle, Washington. 98115

Phone Number of Person to Testify: 205-410-0989

Email Address of Person to Testify: nps32@drexel.edu

(2) The testimony provided will represent the views of the Pension Rights Center.

(3) The Requester has not yet submitted written comments.

If you need any additional information, please contact the undersigned.

I plan to testify with Janice C. Winston, assuming this is possible. Janice's information is:

Name: Janice C, Winston

Address: 266 East Johnson Street, Philadelphia, Pennsylvania 19144

Phone Number: 215-806.0300

Email Address: jcwinston4@gmail.com

We will submit a separate request for Ms. Winston, but our hope is that we may testify together on behalf of the Pension Rights Center. Please note that Ms. Winston requests that we be

scheduled to testify either on the afternoon on the 12th, or anytime during the 13th.

Respectfully submitted,

Norman P. Stein

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## Attachments

### PRC Request to Testify on Definition of Investment Advise Fiduciary

The Pension Rights Center, a non-profit organization that advocates for consumer interests in retirement plans, 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. Below is the information you requested for individuals and organizations submitting a request to testify:

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Name: Janice C, Winston

Address: 266 East Johnson Street, Philadelphia, Pennsylvania 19144

Phone Number: 215-806.0300

Email Address: [jcwinston4@gmail.com](mailto:jcwinston4@gmail.com)

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Norman P. Stein