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From: Patrick & Meghan Flood [mailto:sbfloods@cox.net]

Sent: Sunday, August 30, 2015 12:48 PM

To: EBSA, E-ORI - EBSA

Cc: Meghan Flood

Subject: Comments on Proposed Rule RIN 1210-AB32

To whom it may concern:

I am a veteran Financial Advisor with 22 years experience in the industry. I have consistently been a top advisor at the firms I have worked with, and have built a great reputation in working with retirees, divorcees, and widows. I have also opened, and managed, offices for Smith Barney and Wells Fargo Advisors. One of my areas of expertise is working with options. I use them to hedge out certain risks. I also use them to boost income for my clients who desperately need income in order to survive.

I beg you to reconsider the rule that has been proposed to ban options in retirement accounts. I tell you with certainty that it will directly harm a large group of my clients, and those that are most vulnerable to financial failure. It will have a negative impact on my wealthiest clients, but for them, it will be manageable. Unfortunately, for my clients who I work diligently every day to keep them in their homes, paying for retirement expenses such as healthcare and other basic necessities, it would be devastating. In a world where they cannot survive on interest income in "safe" investments, they are forced to own equities in their retirement accounts to live on dividend income. In a world where living to age 95 is highly probable, equities are actually quite appropriate for a retiree or widow in their 60s. However, when the dividend income falls short of their needs, I use covered call writing to cover the gap. By doing so, I limit their speculative upside, and hedge their risk to the downside. More importantly, by writing calls, I am able to ensure that they don't need to sell investments to cover their income shortfall. And we all know that markets are extremely volatile. Selling begets selling, which turns into a downward spiral. When markets are in turmoil and under stress, that is when investors who sell lose money. And without options, my clients would be "forced" to sell more shares in a down market in order to cover their income shortfall, effectively locking up losses at the worst times possible. This ensures long term erosion of the portfolio and eventual Failure.

Please don't harm those in most need of this essential hedge and income strategy that makes retirement accounts more safe. Remove this rule from any proposal.

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