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Submitter Information

Name: T Anonymous
Address: United States,
Email: tbowman@dejazzd.com

General Comment

This rule is life changing for any advisor who has been advising clients for many years under compensation only. We provide ongoing advice for clients: I have a three page letter listing all of the advise and time we give to our clients for no fee. There are a number of major issues thus far: not being able to purchase GNMA's for IRA's from in house inventories, not being able to help small investors, not being able to purchase class "C" share mutual funds for IRA's, and not being to purchase preferred stocks at $25.00 for new issues. Why would it benefit to purchase a GNMA from the street instead of our inventory when the GNMA in the inventory is a better price or has a better structure than others? We have to call the GNMA department, they call around, get back to us, we call the client, then call the trader back. Meanwhile the GNMA's may be sold out and not available any more. Why is it not in the client's best interest to purchase a "C" share - particularly American Funds? The fees are in the prospectus and are discussed. After 10 years the "C" class converts to an "F" class which greatly reduces the fee. Why would it be in the client's best interest to pay a premium (above the call price of $25.00 for a preferred stock instead of the new issue? Why is it not in the client's best interest to purchase a discounted GNMA in an IRA? In non-IRA accounts, there is a cap gain and the 1099 interest reporting is late. The Gov't reporting has until the last day in February to report to firms because of the accrual basis! We spend many hours of each day, advising clients about anything from how to title an account, gifting, nursing home questions, tax questions, Roth vs Traditional, to convert or not convert, in addition to help settle estates, which is extremely time consuming. We help with DOD values, worthless stock, retitling assets, changing direct deposit, change benef's, etc... A majority of advisors work very hard for their clients and have always acted in the client's best interest. If we didn't, we would not have clients. Every transaction we complete for a client has some risk: maturity risk, credit risk, interest rate risk, etc... We spend most of our lives dedicating every waking minute to our giving our best advise. During Oct 2007 through March 2009 (17 or so) long, difficult months we lost sleep, were very stressed, but were there for every client, no matter how painful it was. We gave them the best advise by encouraging them to invest into quality stocks, bonds and mutual funds, while the market was down. The clients were rewarded for having advisors who cared about them. This DOL rule will push most good advisors into retirement. It will hurt the smaller investor. It will hurt new investors, because they will not invest on their own. It will create a huge problem in years to come, because they will not save for retirement. It will also cause too much or the world's money to be invested in too few assets. Think ETF's, and a few stocks that may continue be over purchased. Consider what happened to ETF's in August 2015 when some opened down by half of the value. Clients deserve a choice, like they have now in all accounts. If advisors can be sued for everything, there would be no reason to give advice. And investors need our help. Regional and large firms have compliance departments that watch the advisors. This rule is costing mutual fund companies, insurance companies, financial firms, banks, etc... so much money to interpret the new rules and attempt to comply. This is already causing fees higher - including record keeping for Simple IRA's, 401K's and other retirement plans. Why would the government get involved in making decisions for retirement accounts when they really do not understand our business? Has anyone from the DOL talked to advisors, before the past administration vetoed the bill and passed this expensive, and complicated rule? My partner and I have hundreds of smaller IRA's, and it will be impossible to convert them all to fee based by 12/31/17. This rule is not in the best interest of our clients. There will be many negative consequences for clients and their retirement accounts if this rule stands as it is.