

From: [George McKenna](#)
To: [FiduciaryRuleExamination - EBSA](#)
Subject: THE DOL's FIDUCIARY RULE
Date: Monday, August 07, 2017 4:09:36 PM

I would like to respond to these two questions in regards to taxable municipal transactions under the Department of Labor's Fiduciary Rule:

Gen 3.

<https://www.federalregister.gov/d/2017-14101/p-33>

3. Do the Rule and PTEs appropriately balance the interests of consumers in receiving broad-based investment advice while protecting them from conflicts of interest? Do they effectively allow Advisers to provide a wide range of products that can meet each investor's particular needs?

PTE 12.

<https://www.federalregister.gov/d/2017-14101/p-44>

12. Are there ways in which the Principal Transactions Exemption could be revised or expanded to better serve investor interests and provide market flexibility? If so, how?

My comment,

The rule prevents Advisers from giving their customers broad base diversification advice for their retirement accounts in an important asset class of taxable municipal bonds. This asset class provides important income in securities that are widely regarded as having a lower default rate than that of corporate bonds. This asset class should be allowed under the rule to provide more choices for customers needs.

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