Your proposed rule is stupid. Obviously, none of the drafters have ever lived in the real world. I do not need, nor do I want, you to "protect" me from myself or from investment advisers with respect to my retirement account. What I want is for you to leave me alone. As a lawyer, I know well that aggressive lawyers and the court system can easily keep in check any true self-dealing problems that IRA investment advisers might indulge in. What we don't need is a stupid rule that will make investment advice more expensive and harder to come by. Your rule guarantees that. At the very least, if you're going to insist on fixing a problem that doesn't exist, amend the rule to allow anybody who wants to (which will include me) to opt out of the "protection" provided by this idiotic rule. You people need to get a real job and leave me alone.