Employee Benefits Security Administration's Office of Regulations and Interpretations  
Attn: Public Hearing on Definition of Fiduciary  
Room N-5655, Department of Labor  
200 Constitution Ave. NW, Washington, D.C

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Although we feel there is a need for a unified fiduciary standard as well as an investment professional regulator standard, we feel the Department of Labor’s (DOL) proposed expansion of the Definition of a Fiduciary at this time is premature and lacks a level regulatory playing field based on today’s complex and dynamic marketplace of investment offerings. We would request that the DOL seek additional information about all actual or implied fiduciary investment duties being performed today as well as allow for a unified investment professional regulator standard to be applied so that any further definition of a fiduciary can be applied across a unified regulatory playing field.

Sincerely,

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