



March 16, 2017

The Office of Regulations and Interpretations
Employee Benefits Security Administration
Attn: Proposed Definition of Fiduciary Regulation
U.S. Department of Labor
200 Constitution Avenue, N.W. Room N-5655 Washington, DC 20210

Re: RIN 1210-AB79

To Whom It May Concern,

As an independent advisory firm focused on retirement, GuidedChoice has always been in full compliance with the new Department of Labor Fiduciary Rule and related Employee Retirement Income Security Act prohibited transaction exemptions, and we fully support the original applicability date of April 10, 2017.

The Rule forces the entire financial services industry to raise its standards when it comes to transparency and clarity. Ultimately, this will help consumers better understand what they are purchasing and receiving for their money, which will in turn improve retirement outcomes and the ability of consumers to make better choices to reach their personal retirement goals. The Rule also raises the bar to improve the industry's fee structure and helps to ensure that everyone is working in their clients' best interest, rather than only their own.

Since the Rule brings further consumer attention to the category and will likely increase competition, many firms will need to more deeply invest in their consumer experience to remain strong. This will bring much needed clarity to marketing and communications. At the same time, it offers the opportunity for the industry to more rapidly innovate and create greater differentiation between offerings and value.

GuidedChoice's track record demonstrates that it is possible to achieve substantial business success by placing the goals, interests and objectives of customers first. We have always worked this way and believe the Rule asks all financial service providers to do the same for the good of consumers nationwide.

Our proprietary process is also purpose-built to meet the most frequently expressed needs of retirement investors. Designed by Dr. Harry Markowitz, Nobel Laureate for Modern Portfolio Theory, our model reflects what 60 percent of participants prefer: less risk over more reward. From this, we offer exceptionally personalized advice and recommendations to help each client navigate the complexities of retirement planning with clarity and confidence.

To date, GuidedChoice has been entrusted with managing over \$13 billion in assets, which we do with extreme care. Along with offering 3(38) fiduciary protection, GuidedChoice has always remained free of influence due to its independent foundation. We have no affiliations with brokerage firms, we are not paid asset-based fees by a manager, nor do we sell any investment offerings within a plan. Avoiding these conflicts of interest is unusual in our industry, but we strongly believe it should be the rule. We are very careful to avoid any actual or potential conflicts of interest that could affect the objectivity or credibility of our investment advice, as the very future of a consumer is at stake if they cannot fully vet a financial services partner due to lack of transparency.

As one of the pioneers in digital retirement advice services, we look at the recent expansion of “robo-advisor” services through a highly experienced eye. For nearly 20 years, we have sought to deliver on our mission to bring financial freedom to everyone with trust and integrity. We believe the Department of Labor Fiduciary Rule and related Employee Retirement Income Security Act embraces many of the best practices we employ, and would have a hugely beneficial effect on our industry as a whole. As such, we strongly support it, and ask that the Department of Labor allow the Rule to go into effect this April.

Sincerely,

Sherrie Grabot
Founder and CEO