



March 17, 2017

Office of Regulations and Interpretations  
Employee Benefits Security Administration, Room N-5655  
U.S. Department of Labor  
200 Constitution Avenue NW.  
Washington, DC 20210  
Attn: Fiduciary Rule Examination

Re: RIN 1210-AB79

To Whom It May Concern,

GECU appreciates the opportunity to comment on the Department of Labor's proposal regarding the delay of the Fiduciary Rule's applicability date. As the largest locally owned state-chartered credit union in El Paso, TX, serving a membership of over 359,000, and with assets greater than \$2.5 billion, we understand the need for sound investment advice and commend the Department on its commitment to protecting retirement investors.

We support and are in favor of the 60-day delay of the applicability date and believe the delay is necessary to allow the Department additional time to address the directives outlined within the President's memorandum, and to avoid confusion and disruption to our members seeking investment services.

The Department should recognize the potential unintended consequences this rule would have on credit union members, especially minimizing the ability for working-class families to engage in retirement and savings plans. The Department should also understand the unnecessary compliance burdens this rule would place on credit unions. We agree with the Department's efforts to protect retirement investors, as this initiative aligns with our core values of integrity and advocacy; however, it is equally important to implement a rule that does not impede the ability of the majority of Americans to access investment products and services.

We respectfully urge the Department to implement a 60-day or longer delay.

We appreciate the opportunity to comment on this proposal. If you have questions regarding our comments, please contact me at (915) 774-8203.

Sincerely,

A handwritten signature in black ink, appearing to read "Crystal Long", is written over a light blue horizontal line.

Crystal Long  
President/CEO

CL:dp