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March 16, 2017

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

Re: RIN 1210-AB79

Dear Mr. Hugler:

Thank you for the opportunity to comment on the proposed delay of the applicability date of the regulation under the Employee Retirement Income Security Act of 1974, as amended ("ERISA") that redefines the term "Fiduciary" under section 3(21) of ERISA and section 4975 (e) of the Internal Revenue Code of 1986, as amended (the "Code") and the applicability dates of the Prohibited Transaction Exemptions (PTEs) granted with the final rule.

Farmers Financial Solutions, LLC (FFS) supports the U.S. Department of Labor proposal to delay the rule by sixty (60) days, from April 10, 2017, to June 9, 2017 to facilitate a review of the rule as directed by the President's Memorandum of February 3, 2017. Considering the analysis called for in President Trump's Executive Order, and the anticipated volume of corresponding public comments, we believe DOL will actually need more time than the 60 days to complete the task.

Farmers agrees with previous leadership at the Department of Labor (DOL) that planning for retirement is important and that all levels of investors should receive ethical, professional guidance. Farmers continues to support a "best interest standard" that would require financial professionals to act in the best interest of their customers, while also preserving the fundamentals of the personalized advice model. Although well intentioned, the final DOL rule introduced complexity and uncertainty to the valuable advice model serving middle class aspirants. We believe further review of the rule will reduce the risk of higher cost and reduced access to Retirement Solutions for working class and middle income individuals, as well as small businesses.

Our comments today only address the proposed delay of the applicability date of the Fiduciary Rule. FFS plans to submit separately comments that address our view of the Fiduciary Rule and the questions raised about the rule in the President's memorandum.

FFS understands that the Department must now carry out this directive and expects that they will need a significant period of time to do so. The Department has the responsibility to carry out this duty with extreme care and has to do so in a manner consistent with applicable law, including the Internal Revenue Code, ERISA, and the Administrative Procedures Act. It is with this in mind that Farmers Financial Solutions, LLC respectfully requests that the U.S. Department of Labor publish in the Federal Register a notice of delay, of not less than sixty (60) days of the applicability date of the Fiduciary Rule.

Sincerely,

A handwritten signature in black ink, appearing to read "John Mueting". The signature is fluid and cursive, with a large initial "J" and a distinct "M".

John Mueting  
President of Non-Insurance Business