April 16, 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

Re: RIN 1210-AB79

To whom it may concern:

FeeX writes this letter in support of the Department of Labor Fiduciary Rule and in opposition to any further delay or revision of the rule.

FeeX has been analyzing individuals' retirement and investment accounts for almost five years, which we believe provides us many unique insights into this matter.

Consumers must be able to depend on the industry and its professionals for prudent and fiduciary financial advice, especially on a topic as critical and fundamental as retirement.

Compliance with the rule is both possible and affordable. As an example, the FeeX platform can run a full and personalized analysis on a participant's retirement account in a matter of minutes, leveraging the 404a5 form as well as participant specific data. Due in part to our economies of scale, we are able to provide these prudent analyses at a reasonable cost. The ascent of affordable technologies which can produce a prudent analysis save advisors time while also providing valuable insights. FeeX already counts some of the largest financial institutions as well as many small independent advisors as clients, further proving the point that this type of analysis is available, affordable and valuable.

As a company that has analyzed over 100,000 accounts, we know that consumers can be shocked when they are presented with the data regarding their own accounts. As a result, they often times take immediate action to improve their position for retirement and thus increase their nest eggs. The fiduciary rule, which requires transparency and a prudent analysis, will immensely benefit retirement investors from every size and every category of company.

Retirement plans of all sizes are affected by non-fiduciary advice and lack of data and prudent analyses. We have analyzed many plans for both large enterprises and small businesses whose employees are paying considerably more than reasonable fees, oftentimes unknowingly. With the data readily available from 404a5 fee disclosures, transparency in the industry will directly benefit retirement investors and employers. It will lead to increased market competition and lower prices and/or better services.

Since the rule was officially in the books over a year ago, FeeX has invested considerable time, money and resources to build new technologies on top of existing in anticipation of the regulation and its original
applicability dates. FeeX was not only responding to the opportunity but also to the demand from the industry to assist with prudent account analysis and compliance. A further delay or repeal of the rule would cause our company considerable harm.

For the reasons stated above, we urge the U.S Department of Labor to move forward with the rule as it is written and with its current applicability dates.

Thank you for your consideration.

Sincerely,

Yoav Zurel, CEO
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