

From: [Kara Lucas](#)
To: [FiduciaryRuleExamination - EBSA](#)
Subject: Regarding GEN 3. p-33 and PTE 12. p-44
Date: Monday, July 31, 2017 11:05:06 AM

To Whom it May Concern,

Any Rule that prohibits an entire asset class is NOT balancing the interest of consumers. Municipal Securities, an asset class with lower default statistics than comparable corporate bonds and in many cases better returns, are prohibited under this rule. Principal dealers specializing in municipal securities are in business specifically to seek out and weed out, in an extremely competitive capacity, the most attractive yield and quality combinations of these securities. This is why customers reach out to them to begin with. Suggesting a conflict of interest here is like suggesting a conflict of interest when cardiac specialists make recommendations to heart patients.

Also, under this rule, customers who have been buying municipal bonds within their retirement accounts for years are now only allowed to liquidate them. This is especially counter intuitive to the rule as it is creating an imbalance in the supply and demand market for these securities, specifically taxable municipal securities, which will only hurt investor values down the road. The PTE should be revised immediately to exempt municipal securities. Prohibiting the purchase of a historically conservative, reliable, fixed income producing product from the firms best positioned to offer both insight and inventory is in NO way better serving the investor.

Regards,

Kara Lucas