



LORD ABBETT

July 30, 2020

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: Financial Factors in Selecting Plan Investments
Proposed Regulation (RIN 1210-AB95)

Dear Director Canary:

On behalf of Lord, Abbett & Co. LLC (“Lord Abbett”), I am writing to support the Principles for Responsible Investment (“PRI”) request to extend the public comment period from 30 days to 90 days with respect to the notice of proposed rulemaking entitled “Financial Factors in Selecting Plan Investments” (“Proposal”). The Employee Benefits Security Administration announced its proposed regulation on June 23, 2020.

Lord Abbett is concerned that 30 days is insufficient to consider such an important and complicated topic. We believe that 90 days will provide a reasonable opportunity for us to properly evaluate the notice and consider formulating and submitting comments. As a signatory to the PRI who is committed to integrating ESG factors into our investment process, having the ability to appropriately consider the Proposal is particularly important to Lord Abbett.

Thank you for taking our views into consideration. If we can be of further assistance, please contact Mr. Robert Herr, Director of Investment Stewardship, at (201) 827-2332 or rherr@lordabbett.com.

Sincerely,

Robert A. Lee
Partner, Chief Investment Officer