

# PUBLIC SUBMISSION

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Financial Factors in Selecting Plan Investments

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Financial Factors in Selecting Plan Investments

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## Submitter Information

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## General Comment

Re: RIN 1210-AB95 ("Financial Factors in Selecting Plan Investments")

I support the proposal.

As a plan beneficiary of a defined contribution plan with no ability to direct investments, I expect that plan managers perform their fiduciary duty to maximize my retirement benefit.

I agree with the Department that "true ties rarely exist". In paragraph (c)(2) I would prefer to see "the fiduciary must document specifically" instead of "the fiduciary should document specifically".

I agree that a plan's default investment option should NOT be an ESG plan. I do not oppose ESG plans being offered as 'opt in' choices.

Regarding (c)(3)(i), since "investment manager investment philosophy" is spelled out as an objective criterion, I would like to see a requirement that the majority of options are not ESG offerings since 'investment philosophy' could call for inclusion of only ESG assets.