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September 15, 2017

Filed Electronically

Office of Regulations and Interpretations
Employee Benefits Security Administration
Room N-5655
U.S. Department of Labor
200 Constitution Avenue N.W.
Washington, DC 20210

Re: **RIN 1210-AB82; Extension of Transition Period and Delay of Applicability Dates**

Dear Sir or Madam:

We are writing to express our support for the Department of Labor's proposed extension of the transition period under the Best Interest Contract Exemption from January 1, 2018 until July 1, 2019. We believe that the proposed delay will allow the Department to assess possible changes to the Best Interest Contract Exemption, issue new and streamlined exemptions and coordinate with the U.S. Securities and Exchange Commission as it embarks on related rulemaking. We note that a corresponding extension of the Department's temporary enforcement policy covering the transition period is appropriate given the magnitude of the changes required by the Fiduciary Rule.

We appreciate the opportunity to comment.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jason K. Bortz".

Jason K. Bortz
(213) 615-4007

A handwritten signature in black ink, appearing to read "Michael J. Downer".

Michael J. Downer
(213) 486-9425