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November 13, 2023

VIA ELECTRONIC SUBMISSION

Office of Regulations and Interpretations
Employee Benefit Security Administration
U.S. Department of Labor
200 Constitution Ave., NW
Washington, DC 20210

**Re: RIN 1210-AC02 Retirement Security Rule: Definition of an Investment Advice fiduciary;
and related exemptions**

Dear Assistant Secretary Gomez:

TruStage requests an extension of the 60-day comment period for the Department of Labor's (DOL) significant Proposed Retirement Security Rule and related amendments to Prohibited Transaction Exemptions (Proposed Rule). The Proposed Rule makes significant and unanticipated changes to the current law, as well as the current regulatory framework, that will require significant time for meaningful analysis and comment.

TruStage is the nation's leading provider of financial products and services to credit unions and credit union members. As part of the cooperative movement, we embrace the credit union philosophy of "people helping people." TruStage believes a brighter financial future should be accessible to everyone.

An extension would benefit not only the commenters, but DOL itself. This brief comment period is unprecedented. When the 2010 Fiduciary Rule was released, DOL initially had a 90-day comment period, followed by a 14-day extension. For the 2016 Fiduciary Rule and Related Exemptions, DOL allowed a 75-day comment period and granted a 15-day extension. We believe that DOL should again provide at least a similar comment period, especially for a proposal that is nearly 500 pages long. An extended timeframe will allow industry stakeholders and other interested parties to provide meaningful input while taking time with their family to enjoy the multiple federally recognized holidays in November and December.

DOL should use comments as a resource, but providing too short of a comment period limits the possible benefits. DOL should also consider holding the public hearing after the extended comment period has concluded. It will provide the opportunity for all industry

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stakeholders and other interested parties to review the submissions and allow the DOL to arrange a constructive and productive dialog.

Thank you, in advance, for ensuring a thoughtful process.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'P. Barbato', with a stylized flourish at the end.

Paul Barbato
Senior Vice President, Chief Legal Officer