PUBLIC SUBMISSION

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Definition of an Investment Advice Fiduciary

Comment On: EBSA-2023-0014-0001

Retirement Security Rule: Definition of an Investment Advice Fiduciary

Document: 1210-AC02 comment 00213 Heer 12272023

Submitter Information

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General Comment

I do not see the value in changing the rule, I do not have any problems understanding who a fiduciary is by using the current 5 part test. I don't recall hearing any people complaining about the difficulty in understanding this, as such it should be left alone.

Doug Heer