

November 29, 2023

Submitted electronically: <https://www.regulations.gov/docket/EBSA-2023-0014>

The Honorable Lisa M. Gomez  
Assistant Secretary, Employee Benefits Security Administration  
U.S. Department of Labor  
200 Constitution Avenue NW  
Washington, DC 20210

RE: *Request to Testify*  
Hearing on Retirement Security Rule: Definition of an Investment Advice Fiduciary and  
Associated Prohibited Transaction Exemption Amendments (88 FR 80648)  
RIN 1210-AC02; ZRIN 1210-ZA32; ZRIN 1210-ZA33; ZRIN 1210-ZA34  
Docket ID EBSA-2023-0014

Dear Assistant Secretary Gomez:

Pursuant to the notice of public hearing on the Department of Labor – Employee Benefits Security Administration’s proposed Retirement Security Rule (88 FR 80648) I am writing to request the opportunity to testify on behalf of NAFA, the National Association for Fixed Annuities<sup>1</sup> at the virtual hearing currently scheduled for December 12 – 14, 2023. Testifiers for NAFA would be as follows:

(1) Chuck DiVencenzo  
CEO and President  
National Association for Fixed Annuities  
1717 Pennsylvania Avenue NW – Suite 1200  
Washington, DC 20006  
414-333-0148  
860-212-2520  
[cjd@nafa.com](mailto:cjd@nafa.com)

(2) Thomas Roberts  
Principal  
Groom Law Group, Chartered  
1701 Pennsylvania Avenue, NW – Suite 1200  
Washington, DC 20006  
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<sup>1</sup> Founded in 1998, NAFA is the premier trade association in the financial and retirement services industry dedicated exclusively to fixed annuities. Our association’s mission is to promote the awareness and understanding of fixed annuities and to educate and inform state and federal regulators, legislators, industry personnel, media, and consumers about the value of fixed annuities and their benefits to Americans in financial and retirement planning.

(3) Pam Heinrich  
General Legal Counsel and Director of Government Affairs  
The National Association for Fixed Annuities  
1717 Pennsylvania Avenue NW – Suite 1200  
Washington, DC 20006  
414-333-0148  
[pam@nafa.com](mailto:pam@nafa.com)

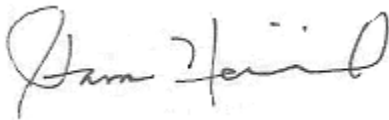
We will be presenting the viewpoint of NAFA membership, which represents the fixed annuity marketplace and, in particular, the independent distribution channel. NAFA member companies and entities include insurance carriers, independent marketing organizations, industry-supporting technology and consulting companies, and independent producers, advisors, brokers, and general agents.

NAFA has not yet submitted a written comment letter on the proposed rule or exemption proposals.

We look forward to testifying on the Department's proposed rulemaking on behalf of NAFA.

Please do not hesitate to contact me if you should have any questions or require additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Pam Heinrich", written in a cursive style.

Pamela M. Heinrich  
NAFA General Legal Counsel and Director of Government Affairs