

August 7, 2017

The Honorable R. Alexander Acosta
Office of Exemption Determinations
EBSA (Attention: D 11933)
U.S. Department of Labor
200 Constitution Avenue N.W. Suite 400
Washington, DC 20210

Re: RIN 1210-AB82 Request for Information Regarding the Fiduciary Rule and Prohibited Transaction Exemptions

How would advisers be compensated for selling fee-based annuities? What regulatory filings are necessary for such annuities?

Compensation can be determined based on a one-

and annuity products.

uniform licensing s

Conclusion

Thank you for the opportunity to comment on this Request for Information. We hope to work closely with you moving forward. Through coordination we can ensure consumers are protected while at the same time achieving regulatory consistency to reduce burdens on industry as they seek to comply with our respective regulatory frameworks. Should you have any questions, do not hesitate to contact Mark Sagat, assistant director financial policy and legislation, at msagat@naic.org or (202) 471-3987 or Heather Eilers-Bowser, financial policy and legislative counsel, at heilersbowser@naic.org, or (202) 471-3973.

Sincerely,



Theodore K. Nickel
NAIC President
Commissioner
Wisconsin Office of the
Commissioner of Insurance



Julie Mix McPeak
NAIC President-Elect
Commissioner
Tennessee Department of
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