CERTIFIED FINANCIAL PLANNER
BOARD OF STANDARDS, INC.

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June 5, 2009

Elizabeth M. Murphy
Secretary
Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549-1090

Dear Ms. Murphy:

The Certified Financial Planner Board of Standards, Inc. (CFP Board) hereby submits a request to have Ms. Marilyn Capelli Dimitroff, Chairman of CFP Board and President of Capelli Financial Services, Inc. in Bloomfield Hills, Michigan, testify on its behalf at the joint hearing of the Securities and Exchange Commission and the U.S. Department of Labor's Employee Benefits Security Administration examining target date funds scheduled for June 18, 2009. Enclosed please find a topical outline of Ms. Capelli Dimitroff's testimony.

Sincerely,

Marilyn Mohrman-Gillis
Managing Director, Public Policy

Enclosure

Topical Outline of Ms. Marilyn Capelli Dimitroff's Testimony

I. Introduction of CFP Board and the importance of financial planning advice [1 minute]
   A. Certified Financial Planner Board of Standards, Inc. (CFP Board) is a non-profit organization acting in the public interest by fostering professional standards in personal financial planning through its setting and enforcement of the education, examination, experience, ethics, and other requirements for CFP® certification.
   B. Financial planning professionals provide services that integrate the knowledge and practices from the fragmented areas of the financial services industry.

II. Target date fund can be a misleading name as the public perceives a target date fund as one intended for retirement and does not recognize the inherent risk in the asset allocation at the target date in many of these funds. [3 minutes]
   A. Use of a specific date in a target date fund implies an asset allocation within a generally accepted range.
   B. The current disclosure requirements are inadequate to inform unsophisticated investors of the asset allocations and investment risks associated with most target date funds.
   C. The current prospectus disclosure rules would allow for inappropriately aggressive asset allocations without adequate disclosure of a target date fund's aggressive asset allocation strategy.

III. Industry standards for asset allocation in target date funds must be established to protect unsophisticated investors. [3 minutes]
   A. Under current practice, two funds with identical target dates may have widely disparate asset allocations.
   B. The industry standards should recognize acceptable ranges of asset allocations for target date funds of different durations.
   C. Establishing industry standards for asset allocation in target date funds is a reasonable undertaking. For example, these ranges could be established by a panel of experts from the financial services industry. In addition, baseline allocations appearing in the Thrift Savings Plan established for employees of the United States Government and members of the armed services can be used as a guideline for accepted industry standards.
   D. Target date fund managers will be able to implement investment strategies within the acceptable ranges of asset allocations to enhance the fund's performance.

IV. The concerns about asset allocation are exacerbated by the treatment of target date funds as a qualified default investment alternative (QDIA) under the Pension Protection Act of 2006. [3 minutes]
   A. When a target date fund is used as a QDIA, the appearance of government approval may lead an investor to presume that the default target date fund is appropriate.
   B. Investors who are defaulted into a target date fund often make no further decision on that fund.
   C. Accepted industry standards with ranges will ensure that target date funds are not misleading to consumers on either extreme—too much cash for the young investor or too much equity for the investor near retirement.