

July 19, 2018

Securities and Exchange Commission

To Whom It May Concern:

I am an Independent financial advisor (FA) and I wanted to extend my support and appreciation to the SEC's efforts in proposing the new Regulation Best Interest (RBI). RBI establishes a standard of conduct that I believe is fair and reasonable for all including myself and my firm when making recommendations to clients. As matter of practice I do not place my interests above that of my clients and have tried to the best of my ability to make recommendations that help my clients accomplish their goals and objectives without prejudice. I am not ashamed of the fact that I make a "fee" and/or "commission" for my services as long as my motivation is to lead my clients to products that provide the best opportunity to accomplish their goals.

I applaud the SEC's efforts in putting forth this regulation. With or without this legal document, I believe, that I and many of my fellow financial advisors place the needs and interests above their own as a matter of daily practice. I support you in this effort. As the industry has expanded its services and methods it is only reasonable to provide clients with information to determine the best way for an FA to work with them.

RBI has provided a Customer Summary Form (CRS) that would require me to present my clients at the point of making a recommendation. Many of the forms in our industry have become so busy and convoluted that clients do not understand the form or why it is necessary. I appreciate the SEC's work on this to provide a simple form disclosing fees, duties, responsibilities, and service models that clients need to understand before making a buying decision. Assuming that a form can be created that is clear and concise in nature to capture the important points mentioned above, I would fully support its use.

I operate as a FA under a broker-dealer (B/D) using the B/D's RIA and the ability to use the term of "advisor" or "adviser". I am licensed and registered under my B/D and as a Registered Investment Advisor and support the efforts of the SEC to restrict the usage of the above terms to individuals that have put in the time to become qualified in both areas. I believe that these terms are loosely used by individuals who have never taken the time or made the effort to pass qualifying exams or complete continuing education. Therefore, I support the SEC's efforts to restrict their usage.

I understand that there have been abuses in our business both in the product and method of payment area. I would like to go on record to strongly encourage the SEC not allow regulations that limit my ability to service my clients either in the product or payment area. One shoe does not fit everyone's foot. Diversity in product, service, and compensation are good for the industry and ultimately for the client when used appropriately. I thank the SEC for attempting to eliminate the conflicts of interest that exist and have existed for far too long in these areas.

Sincerely,

Richard D. Garton