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VIA ELECTRONIC UPLOAD

Mr. Brent Fields
US Securities and Exchange Commission
100 F Street, NW
Washington, DC 20549

Comment on File Number: S7-07-18

Dear Mr Fields:

Per the SEC's request for comments on the proposed "Best Interest Standards" we offer the following.

We are of the belief that the proposed "Best Interest Standard" will increase confusion among investors and put the investing public in a position to be taken advantage of by sales persons who will be labeled as "Advisers" under the proposed rule.

In response to the DOJ's Fiduciary Standard, many brokerage firms promoted fee based accounts. We feel this will be the standard under the proposed 'Best Interest Standard' as proposed by the SEC. But there are times when it is most beneficial for clients to be in a commission based account versus a fee account.

'Advisers' should be a term only allowed to be in use by Registered Investment Advisors. 'Financial Sales Person' should be a term applied to securities brokers who are not subject to the Fiduciary Standard under the Investment Advisors Act.

We do not believe that a broker-dealer must be labeled as a "fiduciary" in order to be held to an equally stringent standard.

We believe the SEC should also include more stringent qualifications for their own examiners and enforcement so they may better understand the intricacies of the business and stop the abusive examination and investigation practices which have been in place. At bare minimum, SEC personnel should hold the same license required of Brokers and Investment Advisors.

As an industry professional of over thirty years, the CEO of both a Registered Investment Advisory and separately licensed Broker Dealer, and a retired College and University Professor and lecturer, I can relay quite a few times when I had to pull out a white board and explain in detail how the Brokerage and Money Management business works to examiners.

What is needed is for the SEC to more closely adhere to the guidance and rules as set forth in previous SEC rulings and the Investment Advisors Act.

The goal of the SEC is to protect investors. Confusing rules and regulations do more to harm to the investing public than help them. Unfortunately we feel the promotion of the SEC's 'Best Interest Rule' will give investors a false sense of security and let their guard down only to be taken advantage of by brokers 'selling' investment products.

Thank you for the opportunity to comment.

Yours truly,



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