Your Relationship with Your Financial Professional: Feedback on the Relationship Summary

We would like to know what you think about a proposed Relationship Summary that describes your relationship with your investment adviser or your broker-dealer (your firm) and your financial professionals. This document summarizes:

- the services the firm offers and the types of fees and costs associated with those services;
- the firm's obligations to you;
- certain conflicts of interest;
- how to find additional information about the firm and its financial professionals and research disciplinary history for the firm or its financial professionals;
- how to report a problem with your investments, investment account or a financial professional; and
- some questions to ask your financial professional to get more information.

It is important to us at the SEC to understand what you, the investor, think so that we can make it easier for you to choose the type of investment services relationship that is right for you. We prepared sample Relationship Summaries to illustrate what they may look like.

- Sample Relationship Summary for a broker-dealer
- Sample Relationship Summary for an investment adviser
- Sample Relationship Summary for firms that are both an investment adviser and broker-dealer

Please take a few minutes to review one or more of the samples and answer any or all of these questions. Please provide your comments by August 7, 2018 — and thank you for your feedback!

If you are interested in background information on the proposed Relationship Summary, or want to provide feedback on additional questions, click here (https://www.sec.gov/rules/proposed/2018/34-83063.pdf).

Questions

1. Overall, do you find the Relationship Summary useful? If not, how would you change it?

2. How useful is each section of the Relationship Summary? Please consider explaining your responses in the comments.

<table>
<thead>
<tr>
<th></th>
<th>Very Useful</th>
<th>Useful</th>
<th>Not Useful</th>
<th>Unsure</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Types of Relationships and Services</td>
<td>O</td>
<td>X</td>
<td>O</td>
<td>O</td>
</tr>
<tr>
<td>b. Our Obligations to You</td>
<td>O</td>
<td>X</td>
<td>O</td>
<td>O</td>
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<tr>
<td>c. Fees and Costs</td>
<td>O</td>
<td>X</td>
<td>O</td>
<td>O</td>
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<tr>
<td>d. Comparisons to different account types</td>
<td>O</td>
<td>X</td>
<td>O</td>
<td>O</td>
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<tr>
<td>e. Conflicts of Interest</td>
<td>X</td>
<td>O</td>
<td>O</td>
<td>O</td>
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<tr>
<td>f. Additional Information</td>
<td>X</td>
<td>O</td>
<td>O</td>
<td>O</td>
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<tr>
<td>g. Key Questions to Ask</td>
<td>X</td>
<td>O</td>
<td>O</td>
<td>O</td>
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</tbody>
</table>

Not applicable for firms that are both an investment adviser and broker-dealer.
3. Please answer the following questions. Please consider explaining your responses in the comments.

<table>
<thead>
<tr>
<th>Options</th>
<th>Yes</th>
<th>No</th>
<th>Somewhat</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Do you find the format of the Relationship Summary easy to follow?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>b. Is the information in the appropriate order?</td>
<td></td>
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<tr>
<td>c. Is the Relationship Summary easy to read?</td>
<td></td>
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<tr>
<td>d. Should the Relationship Summary include additional information about different account types?</td>
<td></td>
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<tr>
<td>e. Would you seek out additional information about a firm's disciplinary history as suggested in the Relationship Summary?</td>
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</tbody>
</table>

4. Are there topics in the Relationship Summary that are too technical or that could be improved? If so, what topics and how can they be improved?

5. Is there additional information that we should require in the Relationship Summary, such as more specific information about the firm or additional information about fees? Is that because you do not receive the information now, or because you would also like to see it presented in this summary document, or both? Is there any information that should be made more prominent?

6. Is the Relationship Summary an appropriate length? If not, should it be longer or shorter?

7. Do you find the 'Key Questions to Ask' useful? Would the questions improve the quality of your discussion with your financial professional? If not, why not?

8. Do you have any additional suggestions to improve the Relationship Summary? Is there anything else you would like to tell us?

**How to Provide Feedback**

You can send us feedback in the following ways (include the file number S7-08-18 in your response):

<table>
<thead>
<tr>
<th>Mail</th>
<th>Secretary, Securities and Exchange Commission 100 F Street, NE Washington, DC, 20549-1090</th>
</tr>
</thead>
<tbody>
<tr>
<td>Email</td>
<td><a href="mailto:rule-comments@sec.gov">rule-comments@sec.gov</a></td>
</tr>
<tr>
<td>SEC Website</td>
<td><a href="https://www.sec.gov/rules/proposed.shtml">https://www.sec.gov/rules/proposed.shtml</a></td>
</tr>
</tbody>
</table>

We will post your feedback on our website. Your submission will be posted without change; we do not redact or edit personal identifying information from submissions. You should only make submissions that you wish to make available publicly.

Thank you!
Questions

1. A form like this is important and needed. It is also necessary that the Broker/Dealer or Investment Adviser go over the sections with the client rather than just give it to them. The client should be expected to sign it before any business is done.
   The best presentation is “Which Type of Account is Best for You---Brokerage, Investment Advisory or Both?” Presenting the differences in parallel columns gives the best chance for people new to investing to understand what is involved.
   I would change it by using the better-known terms first, e.g. commission before transaction based fee and percentage of portfolio before asset-based fee.
   The section on fees might better be presented in a chart—no mention is made of front and backend loads.
   If fees are negotiable, when is this done?
   The Conflicts of inters section might be better after the Obligations section.

2. a. Useful. I think it could be better written, see #1.
   b. Useful. Could be explained better, possibly a chart.
   c. Useful. Definitely needs a chart to be clearer.
   d. Useful. Using the side-by-side form is much better.
   e. Very useful. Should be right after Obligations section.
   f. Very useful. Would be better titled “How to find out about us” or “Other information you need to know”
   g. Very useful. If the whole form could be written in this tone it would be more effective. As it is it usefully points the reader back to things they should be thinking of.
3. a. Yes, in “What Type of Account is Right for You?” not in the others.
   
   b. No, Conflicts of Interest should come right after Obligations to You.
   
   c. Yes, Sample C, “What Type ....... “ is but the individual samples A and B were not.
   
   d. Yes, if there is one that is not covered by the Fiduciary Rule.
   
   e. Yes, I have checked firms out based on advice of reliable professionals.

4. The Fees and Costs section needs to be simplified and presented in a clearer way.

5. A section on how their firm deviates from the two basic types, if it does.

6. The Summary is probably as short as can be done, using different formats e.g graphs where appropriate might shorten.

7. The questions are really useful because they bring the conversation to the actual transactions and how they occur. I think the questions would be a big help to the client and to the professional.

8. Please remember that many people have been smart enough to accumulate enough money to invest and have no idea how to do it. They are very able in their own fields but have no education or experience with investing. I see it as your job to protect them, particularly since they have been forced from the defined benefit programs into 401K programs by government actions.