



**Symetra Life Insurance Company**

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December 7, 2023

Office of Regulations and Interpretations  
Employee Benefits Security Administration  
Room N-5655  
U.S. Department of Labor  
200 Constitution Ave.  
NW, Washington, DC 20210  
Attention: Definition of Fiduciary – RIN 1210-AC02

To Whom This May Concern:

I write on behalf of Symetra Life Insurance Company to request an extension of the comment period for the recently published proposed rule, "Retirement Security Rule: Definition of an Investment Advice Fiduciary." I understand that the Department of Labor's (DOL) Employee Benefits Security Administration (EBSA) recently denied a similar request submitted by a group of life insurance industry trade associations. I respectfully ask that the DOL reconsider and extend the comment period to the more usual term of 90 days.

This proposed rule is an extraordinarily complex piece of regulation that alters not only ERISA but also several prohibited transaction exemptions used by the life insurance industry. It requires close reading and analysis to fully understand and measure the impact to our business and customers. This 60-day period, shortened even further by several holidays toward year end, does not give impacted businesses and consumers sufficient time to provide thoughtful and productive feedback. Extending the comment period would demonstrate a good faith effort to ensure that the DOL receives a full understanding of the impact that the proposed rule will have on consumers.

I respectfully request an extension of the comment period on this proposed rule.

Thank you for your consideration.

Sincerely,

Margaret A. Meister  
President and Chief Executive Officer  
Symetra Life Insurance Company