

September 20, 2022

Office of Exemption Determinations
Employee Benefits Security Administration
U.S. Department of Labor
200 Constitution Ave., NW
Washington, DC 20210
via www.regulations.gov

Re: Request to Testify at Public Hearing on Proposed Amendment to Prohibited Transaction Class Exemption 84-14 – EBSA—2022-0008

The American Retirement Association (ARA) requests an opportunity to testify at the Department of Labor's (Department's) public hearing on the Proposed Amendment to Prohibited Transaction Class Exemption 84-14 (Proposed Amendment), to be held November 17, 2022.

The ARA is the coordinating entity for its five underlying affiliate organizations that represent the full spectrum of America's private retirement system: the American Society of Pension Professionals and Actuaries (ASPPA), the National Association of Plan Advisors (NAPA), the National Tax-Deferred Savings Association (NTSA), the American Society of Enrolled Actuaries (ASEA), and the Plan Sponsor Council of America (PSCA). ARA's members include organizations of all sizes and industries across the nation who sponsor and/or support retirement saving plans and are dedicated to expanding on the success of employer sponsored plans. ARA also has nearly 35,000 individual members who provide consulting and administrative services to the sponsors of retirement plans.

- Allison Wielobob, ARA's General Counsel, would testify on our behalf. Ms. Wielobob's contact information is 4401 N. Fairfax Drive, Arlington, VA 22203 awielobob@usaretirement.org / tel. no. (703) 516-9300.

The ARA's testimony would describe our concerns that the modifications under the Proposed Amendment are significant. We believe they would largely overhaul the relationship between plan sponsors and their advisors. The ARA's testimony would include the potential effect of the Proposed Amendment on the availability of collective investment trusts.

Please contact me at (703) 516-9300 if you have any comments or questions regarding this request.

Thank you for your time and consideration.

/s/

Allison Wielobob
General Counsel
American Retirement Association