



January 3, 2007

Office of Exemption Determinations, EBSA  
Room N-5700  
U.S. Department of Labor  
200 Constitution Avenue, NW  
Washington, DC 20210

Attn: IRA Investment Advice RFI

Dear Sir or Madam:

Thank you for the invitation to respond to the Department of Labor's ("DOL") Request for Information ("RFI") that was published in the Federal Register on December 4, 2006. The RFI seeks information regarding the experience of financial institutions that use a computer model to provide investment advice to participants and beneficiaries of Individual Retirement Accounts and similar plans ("IRAs"). The RFI seeks comments on the feasibility of applying computer model investment advice programs to IRAs. The DOL's letter to Fiserv Trust Company ("Fiserv Trust") dated December 12, 2006, requested a response to the RFI because the DOL identified Fiserv Trust as one of the top 50 trustees of certain IRAs.

Fiserv Trust is a Colorado trust company that provides trustee and custodial services to self-directed IRAs. Fiserv Trust provides services such as asset custody, investment and account transaction processing and tax reporting. Fiserv Trust is unique in that it provides services to financial intermediaries and advisors so they can provide services directly to the IRA account owners. In this role, Fiserv Trust does not provide investment advice to IRA account owners, or to any other person or entity. Therefore, Fiserv Trust does not utilize computer model investment programs or any other type of investment program in the provision of its services.

The DOL's RFI dated December 4, 2006 requests answers to nine questions related to the content and operation of computer model investment advice programs. Since Fiserv Trust does not utilize such programs nor does it provide investment advice in any manner, it is not qualified to provide responses to the questions posed in the RFI.

We appreciate the DOL's recognition of Fiserv Trust's position in the IRA marketplace. If we may be of further assistance, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "Albert Schweiss".

Albert "Skip" Schweiss  
Executive Vice President  
Fiserv Trust Company