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# MetLife®

**Andrew S. Varady**  
Associate General Counsel  
Law Department

March 6, 2009

Filed Electronically

Office of Regulations and Interpretations  
Employee Benefits Security Administration  
Attn: Investment Advice Final Rule  
Room N-5655  
U.S. Department of Labor  
200 Constitution Avenue NW  
Washington, DC 20210

RE: Comment on Final Investment Advice Regulations and Class Exemption

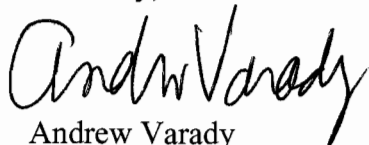
On behalf of MetLife, I am writing to comment on the final regulations and class exemption that the Department published on January 21, 2009, with respect to the provision of investment advice to participants in individual account plans and IRA owners under Section 408(g) of the Employee Retirement Income Security Act of 1974, as amended, (ERISA). These comments are in response to the proposed delayed effective date and request for additional comments made by the Department in your notice released on February 2. MetLife had previously filed comments regarding the Department's proposed investment advice regulations.

We appreciate the significant amount of work and effort of the Department in drafting and releasing the final investment advice regulations and class exemption. The preamble to the final regulations recognizes how important investment advice can be to ERISA plan participants and to IRA holders who are responsible for investing assets in their accounts. In light of the proliferation of participant directed individual account plans and IRAs, significant numbers of ERISA plan participants and IRA holders seek to have greater access to professional investment advice. We thus applaud the efforts of the Department to make personalized investment advice available to ERISA plans and IRAs, thereby furthering the ability of participants and beneficiaries to reach their retirement savings goals. We believe it is critical for plan participants and IRA holders to have access to investment advice, especially in the current economic environment.

In our view, the final investment advice regulations and exemption effectively address the need for broader relief to encourage the development of new advice products, and the regulations and exemption strike an appropriate balance between encouraging financial institutions to make investment advice available to plan participants and protecting plan participants from potential conflicts of interest in providing that advice. We therefore recommend that the final investment advice regulations and exemption remain unchanged, and that pre-existing advice models and exemptions which had existed before PPA remain available and not be affected by any further review or revision of the final regulations.

On behalf of MetLife, we appreciate the opportunity to comment on the final investment advice regulations and class exemption and are available to discuss these comments with the Department.

Sincerely,

A handwritten signature in black ink that reads "Andrew Varady". The signature is written in a cursive, flowing style.

Andrew Varady  
Associate General Counsel