From:
To: Fee and Cost Disclosure

Subject: Consultation on Disclosing Fees and Costs
Date: Monday, 21 January 2019 7:29:47 AM

Dear Sir

In the consultation process mentioned above I should like to pick up a point not mentioned in your consultation paper and related to service provision in general, not solely to the services covered by the consultation paper.

When services are sold and charged to customers receiving them, the service provider quite often also receives remunaration from other parties ('kick-backs'). This is the case quite frequentyl in the funds business, but also for card transactions and other services. Such 'double' remuneration is a problem that makes charges totally intransparent to customers. At the same time, it may create conflicts of interest. A service may be provided in a way that does not fully meet the customer's interests, but is interesting for the service provider from a total compensation point-of-view.

At the same time, it might not be in the interest of customers to forbid such practices alltogether.

But what should be insured is full transparency. Wherever a service provider receives further compensation from a third party for a service provided or a product sold, such compensation should be made fully transparent with each transaction processed for a customer. Such a simple rule would create the necessary transparency as well as a level information playing field, and allow customers a judgement, if conflicts of interest have been dealt with correctly without detriment to the customer receiving the service and paying for it.

Yours sincerely Fritz Thomas Klein

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