

My main concern, as a person who is over 65, and thus, whose accounts would be affected by the rule is that I am without protection if such a suspension causes me to default on legal or contractual obligations. This leaves me responsible for misapprehensions by those who hold my financial accounts. Possible consequences could include losing my medical or other insurance, penalties for failure to meet RMD requirements on IRA's, penalties for late payment of real estate taxes, and so on. 30 business days tends to be way past any customary extension of time to pay. I hate to be put in a position where I need to make all critical payments and distributions 6 weeks early.

(1) In the event of suspension there needs to be a more substantial notice requirement than "attempt to contact" which could include be a little as ringing an unanswered phone without leaving a message.

(2) The principal as well as the trusted representative needs to be notified.

(3) A mechanism more accessible than a court of competent jurisdiction needs to exist for releasing the hold, perhaps through the trusted representative.

Alternatively, a federal law could provide relief in these circumstances.