

ROUNDTABLE

SPEAKERS PANEL



IAN PORTER
Proposition
director – wealth
management
Alexander Forbes



**PETRONELLA
WEST**
Director
Investment
Quorum

“It is not just about price; it is about service. The Sipp brand is still a very good brand; let’s make sure we do not damage it”



**ALISTAIR
HARDIE**
Head of Sipp
Standard Life



JOHN MORET
Director of sales
and marketing
Suffolk Life

“There are people who are concerned about whether investors who have a Sipp fully understand what they have”



“The Sipp is still in a very strong position for a good segment of the marketplace. It is probably the pension vehicle of choice”



DENNIS HALL
Chartered
financial planner
Yellowtail Financial
Planning

SIPPS

Can Sipp survive the tidal wave of progress?



**OWEN
WALKER**
DEPUTY EDITOR,
Pensions Management

Are self-invested personal pensions (Sipps) still attractive as a vehicle for pension saving in the current climate?

ALISTAIR HARDIE: Absolutely. We are all aware of what the Budget has done to the very top end of the Sipp market, but I think if you step back and look at the fundamentals of the Sipp and what it can deliver for a customer, it comes back to the main benefits of choice, flexibility and control in terms of where you invest your money and how you take it out. None of that has been lost; the fundamentals are still there.

DENNIS HALL: It is taking that step first: are pensions still the right vehicle for everybody? If they are, then the Sipp is still in a very strong position for a good segment of the marketplace. We find there is a lot of

interest in them; we are using them for our client bank. It is probably the pension vehicle of choice.

PETRONELLA WEST: In the wealth management market, I would agree with that totally, for the right client. The only thing that concerns me about Sipp is where they are used in the wrong environment, hence the Financial Services Authority’s (FSA’s) pension switching review, because it would appear they have been advised incorrectly. That is detrimental to all of us in the industry, which is a shame, but for the right clients and the right portfolio sizes, they still represent the right investment choice.

IAN PORTER: I would agree very much with what Petronella was saying. I do not think about things from a product-centric view; I try to think about how my clients are treated. Do we still have clients who want things that Sipp can deliver? Absolutely. There is growing awareness. Our experience is that on the back of the market downturn, people are more than ever looking for an investment strategy that underpins their long-term savings. If they want, for example, discretionary fund management for their pension fund or they want to adopt some form of platform-


SUFFOLKLIFE

Expertise that makes the difference

based investment strategy that most high net worth advisers now offer, then Sipp's are an obvious thing to be discussing with clients.

JOHN MORET: We are at quite an interesting point in the development of the Sipp market, because if you look at the figures in the latest survey from *Pensions Management*, it has confirmed that the growth is still there: around 20% over the past 12 months or so, but if you drill down into those figures, you will see that the main growth is coming in the collective Sipp or platform-type proposition, rather than at the top end. That is where it can get confusing. When we talk about Sipp's, we perhaps have to be a bit clearer about what we are talking about. Are we talking about the original Sipp model, which was a basic do-anything type proposition, or are we looking at something that is effectively what used to be a personal pension and is now just called a Sipp?

WALKER: Do you think that is still an issue in the industry: confusion over what is a Sipp and what is a personal pension?

MORET: There are people, the FSA included, who are concerned about lack of clarity and concerned as to whether investors who have a Sipp fully understand what they have, what the choices are, etc. How big an issue it is, I am not so sure. You could take the view that if you are a provider of Sipp's, it is extremely good news, because it means the Sipp market is going to get bigger and bigger, but I think what we will find is that the nature and activities of Sipp providers will maybe change over time.

WEST: Some of the offerings in the market, in particular from Axa, are Sipp's but they are simply offering a more platform-based approach to buying a pension, so you would have to ask if you really need a Sipp? It comes back to cost in the end – are you paying that extra £500-a-year annual Sipp fee to buy a platform; an unfettered personal pension that you could buy cheaper? We see the same money going round; you do not see a lot of new net inflows of cash going into pensions. The money is just transferring from older-style pensions to more modern-style pensions. My concern is the advice that is given to those clients is the right

advice for moving that money, and that they are not moving from one product to another simply because there is a fee or a trail commission involved. There is a lot of clever marketing with Sipp's – since pensions have become unattractive, Sipp's may prove to be a more popular route as they appear to be more upmarket, sophisticated and a better product.

PORTER: The current thrust of Sipp marketing seems to be a raft of 'me-too' products. Everybody seems to think, 'I must have a Sipp to be competitive in the pension market'. If you are a discretionary fund manager, if you outsource investment to one or have a proper in-house investment capability, then you can exploit the benefits of a Sipp.

HALL: It is interesting how few of the top-end Sipp's still do not allow investments in all of the areas that they possibly could. We have clients who want private equity investments and it is a devil of a job to find a reputable and reliable Sipp provider who is willing to accept private equity. There are a couple of smaller Sipp providers out there that will take private equity, but their size and lack of name awareness does not instill enough confidence in clients, and there are too few larger firms that you would like to do business with who open that up as an investment opportunity.

MORET: Ultimately, as a regulated business, risk and risk management is a very crucial consideration, and our view, to date, has been that the risks associated with those types of investments to us as a provider far outweigh any commercial benefit that we would gain from making that sort of flexibility available. We would want a big risk premium in our pricing to accept them.

HARDIE: If you stand back, the benefit of the Sipp industry is the number of players in there, because you have the smaller, perhaps more specialist providers, and they can provide that service. That is good for the industry. A key thing is when an adviser recommends a Sipp provider that they do their due diligence, in the sense of understanding what sort of things you are prepared to offer, what will you not offer, so there are no surprises to the customer. I acknowledge you are not always going

“Our experience is that on the back of the market downturn, people are more than ever looking for an investment strategy that underpins their long-term savings”

to know that at day one with the customer. From a provider's perspective, there is the risk and control aspect to this, which is very big. There are also the commercial aspects. The bottom line is: could we offer that and would it be economical for the customer by the time the provider has taken all their charges?

HALL: If we are saying that there are some Sipp's that look like unfettered personal pensions, then surely if you are not allowing your Sipp investors access to absolutely everything, should you not be tarred with the same brush? There are probably only five Sipp's out there that I have found that will let you have everything that you possibly can. Every other provider places some form of control on theirs, whether the reason is cost-effectiveness or regulatory or reputational risk.

WALKER: Do you have clients who are willing to pay the extra for more exotic investments, such as private equity?

HALL: Yes. I have two enquiries on my desk that have been sitting there for a while. Of the providers that are willing to accept private equity, either we have concerns with them, or the clients have concerns with them. The providers we normally use are not prepared to take them. But I have problems where there are bits of the business cross-subsidising other bits of the business.

WALKER: It is a problem of transparency.

PORTER: The Sipp should be the most transparent product. It is very difficult to get to the bottom of the market because of the number of hybrids on offer. We have just gone through over a whole year's worth of work to repanel the people we will do business with. What we did acknowledge is that there is no panacea; there is not one Sipp that does everything, so we found a couple of people who can complement each other. I do worry though about the focus the FSA has had on Sipp business and transfers; they seem to be suggesting that this may not be the right thing for the clients, but think about the avowed aim of the retail distribution review (RDR) and treating customers fairly (TCF). If the advice industry is to separate the cost of the advice from the cost of the prod-





“There is a lot of clever marketing with Sipp – since pensions have become unattractive, Sipp may prove to be a more popular route as they appear to be more upmarket and sophisticated”

uct completely then Sipp should be one of the key ways in which we can do that for people where appropriate. I would support your crusade for absolute clarity.

HALL: I would love absolute clarity, and I would love interest on clients’ balances to be paid into their account, because currently you have clients with large cash balances subsidising clients who have smaller cash balances, but the costs of running their Sipp should be the same.

WEST: It has been quite interesting in the turmoil of the investment markets that some Sipp providers will restrict which deposit accounts you can open. You go and find a reasonably high-paying interest Sipp-acceptable bank account and then you find you cannot open it, because there is no arrangement between that bank and the Sipp provider.

MORET: Historically, we did not encourage cash held anywhere other than our particular default bank. That was not particularly because of the ‘interest skimming’ argument; it was again back to our operational risk. From a provider point of view, because of the approach of reconciliations that we take, to allow access to myriad banks and building society accounts would be impossible. So our aim was for all cash to go through one bank so we know where the cash is at any point in time. Most providers – or at least the bigger players – will operate in that way. It is not because of the extra revenue that can be generated; it is about a process and having processes that you can control. On the point about interest and transparency, I totally agree that if you wind the clocks back to the early days of Sipp, transparency, compared with the traditional personal pension product and its opaqueness in terms of what was

happening under the bonnet, was one of the major attributes of a Sipp. The challenge organisations like ours now face, is the commercial reality of making a move to total transparency. If the industry en masse went that way, or if the FSA came out and said ‘from tomorrow, you are not allowed to take any part of the interest on the client bank account’, so that everybody was in the same boat, then fine, but it would be a very bold step for an organisation with a big number of Sipp to suddenly operate that way. It is a significant part of most major Sipp providers’ income.

HARDIE: The skimming has been in the press for a long time. In terms of the Sipp bank account, I agree with John; there is a huge operational efficiency derived from using a single account for the purposes of managing the money through a Sipp. We disclose what rates we pay to the customer. That is absolutely upfront. If that is not acceptable, do not take out a Sipp with us. It is about active management of the money in a customer’s bank account. Particularly with what has happened last year, there is no reason why advisers cannot place money on the market to get the customer a decent rate, keep a manageable amount of money as cash in the Sipp bank account for the day-to-day running of the Sipp and also to spread risk, so the customer can maximise their protection under the Financial Services Compensation Scheme.

WEST: If you were able to work out what the increased costs would be for running the Sipp if the client got to keep it all, what would that effect be? I do not know what the financial benefit is to you as an organisation. I understand, but is there a cleaner way to do it?

HARDIE: It comes back to the

point that the FSA might clamp down on this side; there has to be a different way of doing this in the industry. Sorry if I sound like a broken record on this, but a Sipp bank account is a transactional account. Customers want to do trades. It is important that you have the liquidity there to make those trades. If they have income payments to make each month on the same day, then that is what that account is for. If there are bigger deposits to meet a longer-term investment, then I think that is where the Sipp does offer that access to the market with the best rates.

HALL: But there is that issue of cross-subsidy between clients. The guy might be sat on a million pounds of cash and another might be fully invested – one person’s cash is helping to play for the other’s Sipp.

MORET: There is also another area of cross-subsidy in that space, which is where money is immediately moved to investment fund or discretionary managers, and those managers derive interest on the cash rather than the Sipp provider. It would be fair to say that the impact of interest turn does vary from provider to provider. One other important point on this is the underlying rate of interest that you pay on the Sipp account. Our approach has always been to ensure that the rate that the client receives is as good as they would get from the bank if they went there on an individual basis with their cash. Right now, with the rates at the level they are, that argument is probably quite difficult to validate, but as a general rule, when interest rates have been higher, that has always been the approach. The income generated through interest turn I would estimate is probably going to be anywhere between 15 and 30% of a provider’s revenue, so it is not insignificant.

PORTER: If you did truly unbundle everything, Sipp would become a lot more expensive. They therefore become a lot more exclusive. Your potential audience shrinks, which might be right.

HALL: Would that not mean they are then sold for the right reasons?

PORTER: But it makes it very difficult for these guys to run a sustainable business; that is the problem.

HALL: But if a Sipp is fundamentally a wrapper, why not operate like the wrap provider I use, which has a totally unbundled charge structure. They say: ‘This is what we need to charge to run the money.’ It is what

we need to charge to run that wrap. If you want to buy this service and this service, these are the additional costs. If you want a capital gains tax calculation, that is the cost. If you want four valuations a year, it costs you that much a year.

MORET: But that is not the norm.

HALL: It is not the norm, but it is incredibly clean. More and more people are beginning to look behind the scenes of these things and discover what things cost and there is a huge move to things like trackers and exchange traded funds because people are concerned about cost.

MORET: That is right, but if you broaden it out beyond just bank interest, you then have to look at what happens with commissions on unit trusts on platforms, etc. We know that there are companies out there promoting no-cost Sipps. Yet my grandfather always said you never got owt for nowt. That shows itself in other areas of income such as retrocessions, whether it is from discretionary managers, from platforms or whatever. If you just tackle bank interest, it would be a start, but it would not give you the total utopia that you are looking for.

WALKER: Do you think advisers in general fully understand Sipps? Do they hear 'free Sipp' and think, 'Brilliant, my client has a free Sipp'? Do you think they understand the charges behind them? If not, is that a problem?

HALL: They probably do largely understand the charges. I think they have been around long enough, but they see that as the easier sell, because they believe their clients do not understand that.

WEST: I am a bit scathing of projections and illustrations, but the reduction in yield tells you something, if you input the right factors, an illustration that will tell your client whether it is closer to 2% or 2.5% a year. If your quote is saying 1% a year, something is wrong in the data input. I would then question that the adviser might not understand that the reduction in yield is high or low. The client might not understand the impact of that on their overall investment strategy. When you investigate the costs of some of these products and you start putting those investments inside a Sipp, the charges can become quite extreme. I agree with you on the retrocession situation. I hope that gathers more momentum.

MORET: It probably will, on the

back, maybe, of some of the RDR-type activity, but we are a little way away from that just now.

CHARLIE KIRBY: How do you see RDR/RDIP impacting the Sipp market?

PORTER: The idea of costs matching adviser remuneration is fantastic and well-intentioned. However, you soon realise that despite good principles, intentions and disclosure, there are still clients out there who really do not get the cost of advice. If advice is provided it must be paid for, but they do not necessarily like the idea of writing a cheque to us. They are happy for it to come from the product, but when they see that there is an instant matching deduction, they do not like it.

We try to take that a step further now with 'and for that you get this' so that people have a clear expectation. What we do not want our clients to do is focus solely on price. It has to be about value, service and long-term relationships.

HALL: You pay for service. Absolutely right.

PORTER: I get nervous if we focus solely on cost, because these are value-added tax wrappers, at the end of the day. All they are is a tax wrapper. I do not think the RDR would kill it at all, to come back to your question, I just think it would bring into relief those that offer true value for money.

WEST: What also concerns me is that we can criticise the direct sales forces for what they did, and there are none now, but there is still a vast section of the population that does not get the advice, who should be putting money away into something for their retirement provision, who do nothing. These people are no longer able to afford our services.

HARDIE: We have quite an inter-

"There are probably only five Sipps out there that I have found that will let you have everything that you possibly can. Every other provider places some form of control on theirs"

esting commission analysis of our client base: yes, there are advisers who are taking upfront commission, but there is more and more fee business being transacted, which is encouraging. It is interesting to get that insight that people who have Sipps and really are suitable for it in terms of fund size and wealth, still have difficulty writing a cheque for that advice. That is clearly a challenge to the industry to directly demonstrate: what am I getting for my money?

HALL: It is an education process, because I know that the initial meeting I have with people prior to them becoming clients takes longer as a fee-only firm than it ever did previously. I have to clearly address and satisfy all those issues, but then those issues are addressed. Our clients get it – if people don't get it, or want something different, then they leave – clients who sign up for our service have no problem paying a fee, generally because it is cheaper for them.

MORET: A high proportion of our business is transfer business of one sort or another, and which, I have held the view for years, is highly suited to fee-based remuneration and not commission-based remuneration. I would go as far as banning commission, in the old style, on all transfer payments, because I think that has been behind a lot of the problems we have experienced over the last 20 years since personal pensions. One of the challenges for Sipps is how you get more accumulation-type business, rather than consolidation business.

WALKER: What do you think of the FSA's thematic review of Sipps so far? Has it had sufficient coverage and has it gone far enough?

HALL: It is difficult because I suspect that everyone around here who is advising has been doing the job properly. The examples the FSA is using will be unrecognisable to the significant number of advisers already doing a thorough job. But I was involved in another piece of work with the FSA looking at quality of advice and was shocked at what does happen. It really does happen; it is just amazing. Probably they have not gone far enough.

WALKER: In what areas?

HALL: All areas, the quality of advice from certain quarters is abysmal. There is insufficient manpower on the ground to go in and find out what is happening. It is almost as though every single piece of pension transfer advice ought to be looked at



ROUNDTABLE SIPPS

by an independent party, which would cost a fortune; we could not afford it as an industry, but you probably need to look at that, because I suspect a significant number of people are being shafted. I come across complaints where people have been moved into Sipp one and then moved within the year into Sipp two. You are talking big 5%-6% commission lumps on £200,000-£300,000 lump sums.

WEST: It is horrifying to think that stuff still goes on or that people do not realise that is incorrect and not what they should be charged. If there is some sort of flagging system, those are the sorts of things that the FSA should be investigating, as opposed to tarnishing us all with the same brush. That is an issue, but hopefully RDR will sort some of that out and it will get rid of more of those advisers that should not be giving advice in this industry, but it is tough for us.

HARDIE: The benefits of the thematic review are quite obvious because of the growth in the Sipp market, it is right and timely that the FSA come in and have a look, just to make sure that's where the industry needs to get its house in order then it does that. Ultimately, the objective has to be raising standards; with TCF, everything comes to the customer. What I am a bit disappointed with is that there is a feeling that the Sipp is bad or expensive. I think cost is part of the discussion you would have with a customer, but I feel that this is a recurring theme. I do not know if it is the FSA that has taken this view, but Sipp is not necessarily more expensive than traditional personal pensions.

HALL: They can be cheaper.

PORTER: In a way, I am uncomfortable with some of the marketing from insurance companies in terms of forcing people into a product rather than a true wrapper, even if only into a 'Sipp lite'. There is too much blurring of what a Sipp should really be. If I had had my way, it would have stayed with the specialists in the market, rather than being 'I am going to offer one as well'.

HARDIE: It would be fair to say that a while back there was a lack of innovation, probably more 'me-too' Sipp than there are now. What has happened in the past couple of years is that there are more entrants to the market. There are different flavours and people have different views on whether those are Sipp or not, but

“What I am a bit disappointed with is that there is a feeling that the Sipp is bad or expensive. I do not know if it is the FSA that has taken this view, but Sipp is not necessarily more expensive than traditional personal pensions”



more choice is good. It is up to those providers who have now come into this space to demonstrate their credentials and continue to be strong players in the marketplace. That is not just about price; it is about service and demonstrating an investment in people and technology. It is key we do not just see the review as a once-and-done thing, that we make a conscious effort to come back again and see how it is working. Be open and honest in terms of the feedback we have had from customers and share that. The aim is to benefit the industry. The Sipp brand is still a very good brand; let's make sure we do not damage it.

MORET: The FSA initially went a little over the top in their potential demands of providers in two areas: illustrations and clarity of literature. There was a danger the FSA's recommendations would mean the provider did not have any control on their own marketing literature; basically you would have to use an FSA script, which most providers would take exception to. Having said that, there is undoubtedly a case for some tidying-up work and achieving some degree of standard terminology, to improve client understanding. I am also keen on another initiative in the absence of providing true comparisons, illustrations. The idea would be that there is a series of case studies and each provider would give some indication, as best they could, of what the costs of those cases would be using their current terms. That would be incorporated in their literature. This approach does not cover all eventualities but you can see over time it would be possible to build up some sort of comparison of providers.

WALKER: I would like to talk about the Budget. It has been a big

event this year and at the time many were wary of the impact it would have on the Sipp market. John, you did some research to suggest the impact may be very limited on your own book. I wonder if any of you share the concerns that others voiced about various changes in the Budget affecting the Sipp market.

PORTER: For a week or two, there was a shock, and then our clients began to think: 'Hold on a minute, I am still getting tax relief here.' When you are in the high net worth space, most people view a pension for what it is: a tax wrapper with distinct inheritance tax benefits pre-vesting. It has a cap on what you can put into it now, and maybe some of the attractions on funding it have diminished, but it is still a tax wrapper, so what a wealthy client will do is stuff it to the appropriate level and just find something else to invest in.

WEST: My experience is that those at the higher-end earnings levels are less interested in pensions anyway, because they are more restricted on what they can take out and they will look at private equity deals, property deals, which even with the tax rules are much more attractive as they offer the potential for superior returns.

HALL: I do not get what the government is doing. I really do not understand. It is as though they have said that all the work leading up to A-day was meaningless; what was the point in putting in lifetime allowance and an annual cap? It's as if these limits no longer have any relevance. I have clients who are going to suffer because of this, who have recently been putting the maximum into their pensions, and yes they are earning £300k-400k per year, but they have not always been earning that. They spent a long time at uni-

versity; they spent a long time working for little money while putting their own money on the line to get involved in business. Now when they are in their fifties, they are beginning to reap the rewards. They have not been able to make full pension contributions in their 20s and 30s, and they want to catch up now. They have all described this as an envy tax; that is all it is.

MORET: The proportion of our client base that had earnings over £150,000, where we know that information for the last tax year, was something around 25%-30%, so we are playing in the top end space of the Sipp market, and yet only a quarter of our clients are what people would deem to be high earners. When we then looked at those that were contributing, the number that were earning over £150,000 and contributing more than £20,000 was down to around 5%-6% of our total investors, which reflects that a lot of the business is consolidation business, where there is no contribution alongside. So we maybe naively think that the initial impact, certainly until 2011, will be relatively small. Beyond 2011 I am not so sure.

HARDIE: I am sure we all experienced this on Budget day and the day afterwards, trying to understand what the implications were, what all this active forestalling means, disappointing customers, because we had business that was cancelled. People had sat down, taken advice, made the decision to invest in the long term and suddenly it did not make sense to do that any more. So that whole area of confusion in the days after: what is the hidden cost of that to the industry? It is immeasurable. It is frustrating; that is probably a sense that we all have about this.

MORET: If we look back in time, it has been the taxation system for pensions that has caused the problems, and the fact that the taxation, from the government's point of view, has just been another source of income or deferred income. It is a great shame that we moved away from just having a lifetime allowance, which would have provided a cap on the amount of tax relief that was available. If you just had tax relief at 20%, it would be so much simpler.

HALL: With the tax relief, you would never get back more tax than you have paid in the year anyway.

WALKER: Last issue's Sipp survey

showed something like 440,000 plans up and running in the UK. A few years ago, John predicted it would be about half a million mark by 2010, so we are probably pretty much there if you include all the plans from providers that did not reveal their figures. Looking at the next five years or so, how do you see the Sipp market developing?

MORET: Looking at the next five years, I am not sure I will be around in the industry to celebrate a million. It is difficult because earlier we were talking about definitions; it will come down to how you define a Sipp. If we are talking about Sipp as we know them today, I do not see any reason why the growth will not continue. There is an awful lot of money sat in defined benefit (DB) schemes and in poorly performing legacy insurance products or pensions. Provided we do not get to the point where it becomes almost impossible for that money to be transferred because of all the hoops that advisers will have to go through, I see that money finding its way into a Sipp-type wrapper; therefore, I would be pretty confident that we will see the next half million come around a lot quicker than the first half million – maybe five years.

PORTER: The days of explosive growth in the true Sipp market are over. There is a degree of maturity in this market now. So if we as advisers accept Sipp lites, that is where the growth will be in the future. I am not saying that is necessarily the right thing, because I would prefer the Sipp to be a high net worth solution, but what will aid the Sipp's cause will be the transition of the adviser industry towards fees post-RDR, where other options will become less palatable. People will have to offer this type of functionality to fit in

“It is a great shame that we moved away from just having a lifetime allowance. If you just had tax relief at 20%, it would be so much simpler”

with platform and discretionary fund management-based business models, where charging has to be overt. Why reinvent something when the Sipp does a lot of that already? So I think it is an exciting time for the right sort of Sipp.

WEST: I agree with John, I still think there is a lot of legacy business out there that has not been dealt with. In volume terms, it is more likely to come in our direction than anywhere else, and I also think RDR will start to squeeze down those firms that have adopted, perhaps, not the best practice, which can only be good for us. This is our golden era, for asset accumulation and advice giving. As to the volumes, I still think this is a growth market. As to its size and pace, I am not sure, but I still think there are a lot of clients that need a lot of advice who do not get it. As the industry contracts, there is more development and technology and advisers will become more specific about what they use. There is also a lot of confusion between the FSA about what is a wrap, what is a Sipp. Everyone still feels a bit unsure that if they back one horse, is that the right way forward? Time will tell.

HALL: There is a lot of momentum in this area, and not only because of legacy products. If you include Sipp, Sipp lites, pensions in drawdown, and phased pensions, you have this baby-boomer generation now rushing to the finish line, and they are going to want the product to wrap around their retirement provision. I would side with John in a wager and say I too would reckon on a million in five years' time.

HARDIE: Sipp will continue to be predominantly advised and there is a lot of money from people coming up to retirement. I expect to see growth in group Sipp and in the current economy, there is a lot of pressure on company schemes, DB schemes. There is a big opportunity for the industry to take Sipp from where it currently is, from the 45-year-olds plus, where most of the money is, to those who are 35-45, to get them into the savings habit and consider very carefully how they want to engage with the industry, whether it is through a financial adviser, or through new multimedia that is growing day by day. We have to think about the customer here: how do they want to transact with the industry? There are really big opportunities. **PM**

