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I am writing to comment on the proposed rule to classify equity indexed annuities as securities. I am currently securities licensed holding both a Series 7 and 24 as well as the state securities license. Generally speaking I oppose government intervention as, quite frankly, the intent and ultimate consequence of many government regulations are incongruent. However, in this case, I favor classifying these products as a security even though a very good argument can be made that they do not fit the description of a security. My support is primarily grounded in the need to force the annuity industry to hire higher quality people to market these products. By forcing those selling the product to secure a securities license you will accomplish 2 things: 1) eliminate many agents whose only interest is in the commission; 2) protect the public better from unscrupulous marketers by having higher standards. My biggest concern should the proposed rule become law is that the government will use this ruling as impetus to classify virtually every financial product as a security. This would be wrong, detrimental to free enterprise and very costly.

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