

August 25, 2008

To Whom It May Concern,

As an employee of Dressander and Associates, America's premier Life & Annuity marketing company, we have dedicated ourselves to our agents success. This starts with the most well-rounded portfolio in the industry and continues with our seasoned staff who we consider to be the best in our industry.

We are family owned and have been in business for over 30 years. We have under 15 employees that love coming to work every day.

When you couple that with the unparalleled training that we provide, it's no wonder we have become one of the largest and most well-respected companies in our industry.

I feel it does not make sense for annuities that have no market related downside risk to the consumer to be treated as securities. The fixed indexed annuities that we offer are unlike other products where the consumer bears such market risk. FIA's offer many advantages to our consumers. That includes protecting them against market risk and income tax deferral. As long as these products are explained correctly to the consumer and it is the right fit for their personal portfolio, then what is wrong?

I feel we were sand bagged with this issue at the last minute without a lot of time to prepare comments and rebuttals. I am opposed to rule sec 151a and hope we can get a positive outcome for the insurance industry.

Kind regards,

**David A. Cohen**

*Dressander & Associates, Inc.*