

MEMORANDUM

August 29, 2008

To: File S7-14-08
From: Hunter Jones
Re: Proposed Rule Concerning Indexed Annuities

On August 6, 2008, Michael Oxley of Baker & Hostetler LLP, representing Old Mutual Financial Network, spoke by telephone with Chairman Cox. Mr. Oxley discussed the Commission's June 2008 rule proposal regarding indexed annuities and Old Mutual's request, in a comment letter dated August 1, 2008, that the Commission extend the comment period on the rulemaking. A copy of Old Mutual's comment letter is in the public comment file.