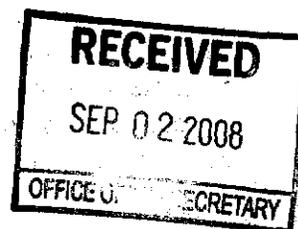




The  
League  
of Life and  
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Insurers  
of  
Maryland

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August 22, 2008

Ms. Florence E. Harmon  
Acting Secretary  
U.S. Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20549-1090

Re: Request for an extended comment period on Proposed Rule 151

Dear Ms. Harmon:

The League of Life and Health Insurers of Maryland, Inc., the state trade association representing the interests of life and health insurers doing business in Maryland, respectfully requests that the Securities and Exchange Commission grant at least a 90-day extension beyond September 10, 2008 for the comment period on Release Nos. 33-8933 and 34-58022. Such extension would allow time for a complete and careful analysis of the Commission's proposed new rules that would define the terms "annuity contract" and "optional annuity contract" under the Securities Act of 1933, and exempt insurance companies from filing reports under the Securities Exchange Act of 1934 under certain circumstances.

A 90-day extension of the comment period will allow sufficient time for thorough and carefully reasoned responses that will address the potential issues and consequences raised in the proposed rule. Because proposed Rule 151A will have varied consequences for insurance companies, depending on their business model, the types of products they offer, and their distribution systems, we respectfully request that additional time is required for analysis.

An extension of the comment period will allow our members and all interested parties sufficient time to prepare and submit comprehensive and constructive comments.

Thank you for your consideration.

Sincerely,

*Deborah R. Rivkin / CR*

Deborah R. Rivkin  
Executive Director