**KASTENS INSURANCE AGENCY**

"Insurance of all kinds"  
4105 Union Street  
Elk Horn, Iowa 51531

August 28, 2008

Secretary  
Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549

Re: File Number S7-14-08

Dear Mr. Secretary:

As a licensed insurance professional, I must write to you to inform you that I absolutely do not support adopting Rule 151A, which classifies most indexed annuities as securities. Furthermore, I also believe that if indexed annuities are classified as securities, eventually other annuities and insurance products may come under this ruling.

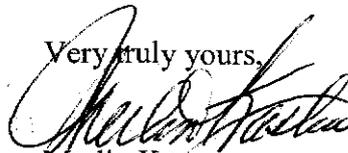
I firmly believe that indexed annuities should continue to be treated as an insurance product since they do not share the same investment risk as investment products such as mutual funds and individual stocks.

As a member of the National Association of Insurance and Financial Advisors, I feel that they will continue to work with state and federal people on my behalf, to develop products that will be suitable insurance products for the marketplace.

Lastly, I am 66 years old. I do not have a securities license. If indexed annuities and insurance products would come under this ruling it would greatly have an adverse effect on my income.

For these reasons, I urge the SEC to withdraw the proposed Rule 151A. Thank you very much for your consideration of my view points on this matter.

Very truly yours,



Merlin Kastens