

Dear SEC:

I'm writing you my comments on rule 151A. If you pass this rule, It will dramatically effect my families quality of life. My income would be decreased by 50%. I'm very upset about this rule! Just imagine how you would feel if tomorrow , I took 50% of your income away because the actions of someone else, and you had no way of replacing it! Your decision is going to have a huge financial impact on many people, businesses, and consumers. Who ENJOY this product and it's benefits for what they are INSURANCE!!

This situation has me seriously concerned about my future and my ability to provide for my family. So I started thinking What is the real purpose of this rule, Who does it benefit?

Its obvious the main purpose has to be to eliminate agent misconduct. I believe there probably is agent abuse with index annuities, but I don't believe there's any more than any other insurance product. In my 17 years in the insurance business, I've found most of the misconduct comes from CAPTIVE AGENTS, who can only sell certain products or product lines. They operate with the company and there best intrests coming first ahead of there client. There told what to sell and brainwashed into believing it's the best product on the market. By reclassify annuities as securities does nothing to address this problem. It only contracts the marketplace! Agents should NEVER sell an annuity only OFFER it ! Only by researching multiple companies and multiple policies and than reviewing the different benefits with your clients which allows them to CHOSE what right for themis the proper way to market an annuity! Whether the SEC or the STATE INSURANCE COMMISSION regulates this product, There will still be agents who do the WRONG thing.

Who does this rule benefit? Well it can only be one group of people STOCK BROKERS and MUTUAL FUND MANAGERS. Who have lost alot of business to insurance agent offering a SAFE investment ! Who have been able to help protect seniors retirements! Seniors need to have competition in the marketplace, Annuities do have a place in a diverse portofio. Stock brokers have NO INTENTION in offering annuities !! Annuities don't meet there idea of a good product, it has simplistic diversification with tax advantages. They want to use products that are complex and so confusing that the clients have no idea what there money is invested in or who it's invested with. I have yet to find a senior client who knew what and with who there money was invested! If that does QUALIFY for BROKER MISCONDUCT i don't know what does! I think maybe you should worry about that instead of if annuities qualify as a security!

The only thing this rule will accomplish is alot of financial hardship for everyone involved in the insurance industry. Take a product away from seniors who need it to fill out there portolio. I think annual certification and product certification would solve these problems better than rule 151A. PLEASE RECONSIDER THIS RULE AND THINK ABOUT EVERYONE YOU WILL HURT WITH YOUR VOTE!!

Devin Smith