

SEC151a COMMENTARY

July 11, 2008

I have been in the Insurance industry for the past 32 years and have in excess of 300 clients. The majority of these clients have invested in a variety of Index annuities and I have never received one negative comment about this product.

The following are my thoughts and concerns relating to the proposed new SEC regulation after reading the proposed regulation.

The clients who have invested in Index annuities with me have been looking for the following pertinent items:

- Safety of Principal
- Participation in the Stock Market without the potential of losing principal
- Long Term retirement Investment
- Elimination of Probate expense
- No cost or sales charge to make their Investment

My clients are not at risk for the fluctuating Stock Market nor other risks that Stock Market Investors assume.

The Insurance industry has done an outstanding job using a Client Suitability Form and product Disclosures to ensure the client understands the Investment and that they are suited for an Index annuity.

Why has the SEC decided not to include either Index CD's or Index Universal Life in this regulation ?

With the passage of the regulation the Index annuity product will change dramatically due to additional costs that my Industry will have to incur with this proposal. These costs will actually be borne by the consumer with a different type of Index annuity that would be available. The consumer will lose benefits that they currently receive from Index annuities today.

It seems to me that my Industry along with State Insurance departments have done an outstanding job of protecting consumers from unfair business practice's and products.

In closing, I believe that the compensation earned from marketing Index annuities is closely equivalent to the costs and fees charged by the Stock Market Industry when accounting for "trail" commissions by registered Investment Brokers. As previously stated the Consumer does not incur a charge or cost to make their Investment.

Respectfully submitted,

A concerned Life Insurance Agent