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Wealth Preservation, Inc.

Long Term Care – Life – Annuities – IRA - Retirement Savings

National Association of Insurance & Financial Advisors - American Association for Long Term Care Insuran State LTC Partnership Certified in North Dakota & Minnesota

Securities & Exchange Commission 100 F Street NE Washington DC 20549

SEP 1 0 2008

OFFICE OF INVESTOR EDUCATION AND ADVOCACY

RE: Proposed Rile 151A

Just a brief background on myself. I have been in the insurance business for 25 years since graduating from college. I have served as a director and Ethics Chair for my local NAIFA organization and just finished four years on the North Dakota Governors Commission on Aging.

I am proud to call myself an "Insurance Agent", who deals in guarantees to my clients that only the insurance industry can deliver.

As I see it there are only a few parties that want to see this regulation proposal enacted that would change established insurance law. First would be stockbrokers who as of late are weary of explaining losses to their clients and do not want to compete anymore. It would just be easier to regulate the competition out of existence. The same could be said for captive insurance agents whose carriers do not have the FIAs in their portfolio.

State Securities officials who would like to expand their control over the area now regulated by Insurance Departments. Nothing new in having territorial fights at the government level, never mind the increased costs and reduced income to those that get in the way.

Broker Dealers who simply want to take commission for work they don't do or even know anything about.

Finally the NASD/FINRA. The name change says it all, they want to be the gatekeeper for everyone's money and the FIA market is a thorn in their imperial side. They simply want "A Piece Of The Action"

<u>www.aaltci.org</u> www.KWentz.FIAtoday.com

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I have had so many clients in the last year that are so very happy they moved some of their true securities products to FIAs and have not had to worry about all of their retirement savings. They like the security that living benefit riders offer as well as the simple guarantee of principal and annual gains. Not available with mutual funds.

NASD/FINRA proposes to regulate products they don't even consider a true asset when determining asset allocation. Agents would be required to go through broker dealers to sell FIAs but in order to keep doing business with the Broker they will be required to sell a certain amount of true securities. I have always followed a model of working with a portion of my clients assets. NASD does not even take in to consideration whether a client has Long Term Care Insurance, what a colossal joke.

I would encourage you to follow the advice if the Iowa Insurance Commissioner who is leading the way to stop any abuses in the industry. Complaints can be handled at the state level and the state insurance departments actually know how to oversee these products unlike the greedy NASD/FINRA. Remember the law of unintended consequences. They NASD wants to control everyone and the courts have previously ruled that they have no part in oversight of guaranteed insurance products no matter what their name change implies.

If 151A is enacted they are three agents in our office will simply will not sell these products anymore. This reduces are staffing needs as much as or income would suffer. The increased costs are also a big deterrent.

September 2, 2008

Thank You,

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