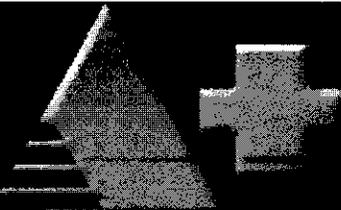


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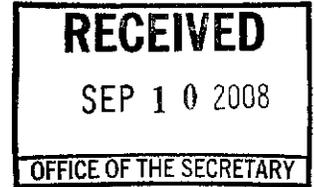


Group Inc.,

3211 5th Avenue SW, Naples, FL 34117 Phone: 239-352-7755 / 800-473-7587 Fax: 239-352-1442 E-mail: gary@aplusfg.com

September 8, 2008

SEC Chairman Cox
SEC Headquarters
100 F Street, NE
Washington, DC 20549



RE: Proposed Rule 151

Dear SEC Chairman Cox:

I am writing to ask that you oppose Proposed Rule 151. As a Series 6 and conservative independent insurance agent for the past 23 years, I have been exposed to many new and purposeful forms of legislation that have protected the consumer. However, upon review of Proposed Rule 151, I feel strongly that this rule would negatively impact not only myself as a small businessman, but, also, the companies that offer these products and in the end the consumer.

Added security regulations to Fixed Index Annuities, a product that by nature guarantees a minimum interest rate with no risk of loss or premium, would minimize the availability of this conservative product to the consumer by making them available only through registered representatives holding a Series 7 license, instead of insurance agents. With the adoption of the NAIC Annuity Disclosure Regulations by the companies offering Fixed Index Annuities, the consumer is clearly informed of all terms of the annuity contract, including prominent disclosure of surrender charges. Added SEC oversight would not add any meaningful protection over and above what is already being done by state insurance regulations and would in fact greatly impact the more conservative investor, who may be presented more aggressive Variable Annuities, Mutual Funds and Managed Accounts over a conservative Fixed Index Annuity. Many small businesses, like my own, and the companies that offer these products would also be negatively impacted by the adoption of this rule.

I oppose this rule and ask that you please extend the comment period to look into the implications Proposed Rule 151 would have on consumers and small businesses. Upon review it is my hope that you find this rule unnecessary and detrimental to all parties involved.

Sincerely,

Gary Indianer
A+ Financial

Gi/jrcr

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