



ING FINANCIAL PARTNERS
Jacob Dobbins
Registered Representative

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OFFICE OF THE SECRETARY

September 5, 2008

SEC Headquarters
100 F Street NE
Washington, DC 20549

Dear Gentlemen:

I am writing this letter to state my opposition to the SEC's proposed Rule 151A which would require indexed annuities to be treated as a security.

As a licensed insurance agent I can state this would affect thousands of insurance agents in making a living. These products are extensively regulated by the Insurance Commission and the State Insurance Department. There is no valid reason to call it a security.

An indexed annuity is nothing like a security. The principal is guaranteed and there is a minimum interest guaranteed. Once that interest is earned it is guaranteed. There is no chance of loss as there is with a security.

This proposed regulation will add no additional protection to the consumer. This regulation would negatively affect thousands of consumers and small businesses. Please do what you can to oppose and stop this silly regulation.

The SEC says it does not want to affect indexed life insurance even though it works the same way an index annuity does. That further illustrates there is no valid reason for this regulation.

Your attention to this matter is appreciated.

Sincerely,

Jacob C. Dobbins

410 E Main St -- P.O. Box 2630
Mountain View, AR 72560
Phone: 870.269.4043
Fax: 870.269.4039
Email: jake.dobbins@ingfp.com

Member SIPC