

SEC Headquarters  
106 F Street, NE  
Washington, DC  
20549

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SEP 15 2008  
OFFICE OF INVESTOR  
EDUCATION AND ADVOCACY

Sirs:

Reference proposed Rule 151A:

This rule change will have profound effect on mine, and many other licensed insurance professional agents. First of all, not one of the clients who have purchased an Index Annuity through my agency has ever lost a penny on this type of Annuity. Secondly, not one of the clients who purchased this type of Annuity has ever expressed any dissatisfaction with the way the Annuity has performed compared to alternatives. Thirdly, an insurance protected retirement asset appears to be exactly what many older people need at a time when chaos threatens many alternatives. Would you please allow the insurance industry adequate time to prepare responses that may be different from those that are currently being suggested?

Terry Piper