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The Honorable Christopher Cox  
Chairman  
U.S. Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549

Dear Chairman Cox:

I am writing to respectfully ask that the Securities and Exchange Commission grant at least a 90 day extension of the comment period on Release Nos. 33-8933 and 34-58022 concerning annuity products. As you are aware, the Proposing Release contains almost 100 pages and 100 questions for comment about a very complicated subject that requires considerable analysis to prepare full comments. For a number of groups, like the like the Federation of Iowa Insurers, a lengthy process is needed for formal comments to be submitted from the member organizations. I believe that it would be both proper and necessary to grant an extension, so that the appropriate entities could provide their full thoughts to the Commission.

Sincerely,



Tom Harkin  
United States Senator