



700 Walnut Street, Suite 1600
Des Moines, Iowa 50309

August 18, 2008

Ms. Florence E. Harmon
Acting Secretary
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549-1090

Dear Ms. Harmon:

The Federation of Iowa Insurers¹, respectfully requests 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 to permit a complete and careful analysis of the Commission's proposed new rules that would define the terms "annuity contract" and "optional annuity contract" under the Securities Act of 1933, and exempt insurance companies from filing reports under the Securities Exchange Act of 1934 under certain circumstances.

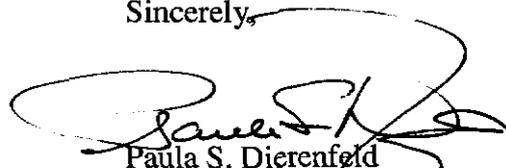
The Federation of Iowa Insurers strongly supports reasonable regulatory efforts to ensure that Annuity products are offered in an environment that protects the interests of purchasers. The Proposing Release is almost 100 pages long and poses nearly 100 questions for comment. A 90-day extension of the comment period will allow for more thorough and carefully reasoned responses which will enhance the regulatory goals articulated in the Proposing Release. Since proposed Rule 151A will have different consequences for different insurance companies, depending on their business model, the types of products they offer, and their distribution system(s) additional time is required for analysis. In addition, consideration must also be given to the impact the Proposed Rules would have on a variety of other sectors, including insurance agents and agencies, broker-dealers, state insurance regulators, state securities regulators, and of course the investing public.

¹ The Federation of Iowa Insurers is an association representing the life insurance, health insurance, managed care, and financial services industries in Iowa. Its 25 member companies provide life insurance, health insurance, pensions, annuities, disability income, supplemental coverage and a variety of other financial services to millions of Iowans and to people throughout the world.

An extension of the comment period will allow our members and all interested parties to have adequate time to complete the analysis necessary to make comprehensive and constructive comments.

Thank you for your consideration of this request.

Sincerely,



Paula S. Dierenfeld
Executive Director

cc: Susan Nash, Esq.
Associate Director

Keith E. Carpenter, Esq.
Senior Special Counsel

Federation of Iowa Insurers Member Roster

AEGON companies

Aflac

Allianz

American Equity Investment Life Insurance Company

American Republic Insurance Company

American Family Insurance Company

Ameriprise Financial, Inc.

Assurant

Aviva Life and Annuity Company

Coventry Health Care of Iowa

CUNA Mutual Group

Delta Dental of Iowa

FBL Financial Group, Inc.

Health Alliance – Midwest, Inc.

Homesteaders Life Company

ING USA Annuity and Life Insurance Company

Magellan Behavioral Care of Iowa

Medical Associates Health Plans

MetLife

Midland National Life Insurance Company

Principal Financial Group

Prudential

Sanford Health Plan

State Farm Insurance Company

UnitedHealthcare

Wellmark Blue Cross and Blue Shield