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 Insurers\(^1\), 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,

[Signature]

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