

James G. Finneran, CRFA, CSA

August 26, 2008

Dear Sirs:

I have been in the business of providing long term care insurance, Medicare supplements, life insurance and guaranteed annuities in the state of Washington since 1989.

I have nearly 250 clients with guaranteed/index annuities and nearly every one has voiced relief that they have not suffered loss of principal through the most volatile swings of the stock market.

Proposed Rule 151A would seriously effect my business causing me burdensome and expensive licensing requirements. Fixed annuities guarantee principal plus provide a minimum interest guarantee, the client has no risk. My clients want the security offered by this type of product and are pleased when they very often receive a higher interest deposit than is guaranteed because the index performance has warranted such.

To force securities licensing and regulations on the companies and agents and securities regulations and paperwork on the clients who wish to own guaranteed index annuities will only increase the cost to agents and insurance companies doing business and lower the return to the client. Arduous and unnecessary layers of regulation stifle business and cost money. Since there is no market risk in a guaranteed index annuity there is no need to treat it like a security, it is a contract and already governed by contract law.

Although there has been some criticism of guaranteed index annuities, the few instances of abuse are similar to abuses that occur with all financial products, including those regulated by the SEC. In the last couple of years the companies and states have worked hard to put in place logical controls, and the products have evolved to further meet consumer needs. States and companies have in place resources to respond to consumer concerns and provide local and thorough investigations of consumer complaints.

The proposed rule appeared unexpectedly and with a very short comment period. The proposed rule represents a significant potential impact on the financial services industry and consumers and deserves adequate time for examination and analysis to determine the extent of its impact. An extension of the comment deadline is essential to develop a complete analysis.

Thank you for your consideration.

Sincerely,

James G. Finneran