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Transamerica  
Financial Advisors, Inc.  
A Registered Broker/Dealer

February 28, 2007

SEC Headquarters  
Attn: Chairman Christopher Cox  
100 F Street NE  
Washington, DC 20549



CHAIRMAN'S  
CORRESPONDENCE UNIT

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RECEIVED  
ES 119669

Re: NASD Proposed Changes to Rule 2821

Dear Mr. Chairman,

I've written you several times with regard to proposed changes to Rule 2821. As a Registered Principal it is my opinion that a 2 day review period on the suitability of a variable annuity is too short a time. As an independent broker/dealer OSJ, many of my Registered Representatives are housed outside of my office, and a 2 day review process would be very difficult, if not impossible to adhere to. I am afraid that in the Rep's haste as well as the supervisor's haste to review these trades under the appropriate time line, needless mistakes could be made. I urge you to allow a longer review period which is more reasonable.

In addition, the unintended consequences of these rule changes would be, in my opinion, to bring needless scrutiny to an excellent investment vehicle. Variable annuities, in my opinion, play an important part in generating lifetime retirement income for my clients. They also provide a guaranteed death benefit to a widow or widower, who are unfortunate enough to lose their spouse during a market downturn. Death benefit provisions of variable annuities are one of the only investments of their kind that allow investors to invest for growth of principal plus give them an assurance that if something catastrophic happens, like a premature death, it will not bring financial devastation to that family.

I urge you to consider the 2 points above.

Thank you for your time and courtesy.

Sincerely,

A handwritten signature in black ink, appearing to read "A. Petsis". The signature is written in a cursive style with a prominent initial "A".

Anthony Petsis, CLU  
Chartered Financial Consultant, LLC  
Registered Principal  
Transamerica Financial Advisors, Inc.  
"A Registered Broker Dealer"

AP/mmz