

June 11, 2008

James Wrona, Associate Vice President and Associate General Counsel  
U.S. Securities and Exchange Commission  
100 F St. NE  
Washington D.C. 20549

Re: File Number SR-FINRA 2008-019  
Proposed Rule Change To Amend Certain Provisions of Rule 2821

Dear Mr. Wrona

EquiTrust Marketing Services, LLC (ETMS) would like to offer comment on the above referenced rule filing by the Financial Industry Regulatory Authority, Inc. ("FINRA"), which seeks to amend certain rule changes relating to sales practice and supervisory requirements for transactions in deferred variable annuities. Specifically, FINRA is proposing amendments to paragraph (c) of new Rule 2821 in order to address industry concerns about the principal review requirements contained therein.

In the proposed rule amendment to Rule 2821(c), you have proposed that Principal review and approval is to occur "no later than seven business days after an office of supervisory jurisdiction of the member receives a complete and correct application package..." The Office of Supervisory Jurisdiction (OSJ) referred to in the rule proposal should be clarified to specify an OSJ where final acceptance (approval) of new accounts on behalf of the member takes place.

Member firms often have multiple OSJ locations where managers reside and supervise staff, but no new account or order acceptance takes place. The amendment should clarify that receipt of a check and application at one of these OSJ locations does not trigger the seven business day requirement. Only when receipt occurs at the OSJ responsible for such activity should the seven day requirement begin.

We appreciate the opportunity to comment on the proposal. If you have any questions about our comments or need additional information, please do not hesitate to contact us at the telephone numbers listed below.

Sincerely,

Deborah Peters, Director  
Broker Dealer Compliance  
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