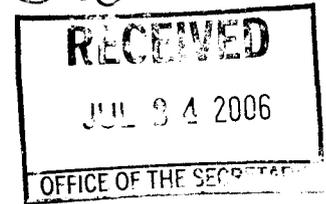


320



July 15, 2006

Ms. Nancy M. Morris  
Secretary  
Securities and Exchange Commission

Re: File No. SR-NASD-2004-183, Amendment No. 2

Dear Ms. Morris:

I am writing to you regarding NASD Rule 2821, Amendment 2.

As a Registered Rep with Transamerica Financial Advisors, we already have in place checklists and requirements that already explain the features of the product such as fund expenses, surrender charges, optional cost of contract riders, surrender period charges and risks of the product. We also disclose possible tax penalties for early withdrawals

Enforcing requirements already in place is all that's needed—any more requirements will be redundant.

Your attention to this matter is greatly appreciated.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gary H. Miyashiro".

Gary H. Miyashiro  
Registered Representative