

Armand Batocabe
529 Lake Drive
Delray Beach, FL 33444

August 5, 2005

Jonathon G. Katz, Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-9303



RE : **File Number SR-NASD-2004-183**

Dear Mr. Katz:

I am requesting an appropriate timeline for the development and re-structuring of office support to meet the proposed supervisory standards.

It is of great importance to have our office well prepared for the improvement of supervisory standards of deferred variable annuities ("DVAs"). With the current proposal, principal review and approval of DVAs would require additional hiring, training, and numerous changes in procedures and processing of DVAs. We have many issues to consider within branch supervision and homeoffice. Adding to our daily supervision specifically the requirement of approving DVAs prior to submission to an issuing insurance company, due to the volume of sales and quick turnaround, proper staffing require a longer process.

The proposed supervisory standards of DVAs will be a major impact and a longer time period for preparation is in demand.

A handwritten signature in cursive script, appearing to read "Armand Batocabe".

Armand Batocabe
Service Center Manager