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Transamerica
Financial Advisors, Inc.
A Registered Broker/Dealer

June 26, 2006

Ms. Nancy M. Morris
Secretary
Securities and Exchange Commission

Re: File Number SR-NASD-2004-183, Amendment Number 2

Dear Ms. Morris,

I am a Registered Rep with Transamerica Financial Advisors and I am writing to you to express my concern regarding NASD Rule 2821, Amendment 2.

Our Broker/Dealer under the general suitability Rule 2310 requires us to present a current Variable Annuity prospectus, explain the important features of the product with regards to charges, underlying fund expenses, cost of contract riders, surrender charges, surrender charge periods, and the underlying risk of principal of the product's sub-accounts.

In addition, we also have to disclose possible tax penalties for early withdrawals and that there are no additional tax-deferred advantages if we are funding an IRA with these Variable Annuity products.

The additional disclosure requirements of Amendment 2 are redundant to what we already have to disclose and it will only cause confusion to the consumer with more disclosure, more signatures, more client initials, much like applying for a Mortgage.

Sincerely,

A handwritten signature in black ink that reads "Dennis Higuchi". The signature is fluid and cursive.

Dennis Higuchi, CLU, ChFC
Registered Representative