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Transamerica
Financial Advisors, Inc.
A Registered Broker/Dealer

June 28, 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.

This amendment is very onerous and requires the client to acknowledge some very confusing and complicated rules. As a representative for over 25 years, I have built a very good practice by abiding by the laws and being very cognizant of disclosures and explaining fully the ramifications of various investments to my clients. My clients trust me because I have been very diligent and careful with their investments and they believe that I am recommending investments that are suitable and appropriate.

In addition, 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 regard 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 a qualified plan 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 and more signatures. I'm upset that the few Representatives ruin the practice with unscrupulous methods and make it more difficult for compliant representatives like myself. The products today are more complicated and additional requirements will only confuse our clients further.

Sincerely,

A handwritten signature in black ink, appearing to read "Allen Kamemoto", with a long horizontal flourish extending to the right.

A Registered Broker/Dealer and Investment Advisor
Member of NASD and SIPC