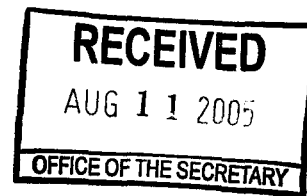


August 8th, 2005



Denise M. Roth
5581 Calico Road
West Palm Beach FL 33415

SR-NASD-2004-183

Mr. Jonathan Katz
Secretary
U.S. Securities and Exchange Commission
450 5th Street
Washington DC 20549

RE: Proposed NASD Conduct Rule 2821 Concerning the Supervision and Sale of Variable Annuities

Dear Mr. Katz:

Thank you for providing the opportunity to comment on the above noted case. In light of the complexity and changes being suggested in the above-proposed ruling, I believe it in the best interests of all parties involved if an extension were granted.

In order for this important ruling to be properly analyzed and commented on additional time is required. If this ruling were to be implemented as it, the industry would face a huge challenge in order to update procedures and systems in order to comply.

Thank you in advance for your attention to this matter.

Respectfully,

Denise M. Roth
Vice President, Operations
Registered Principal