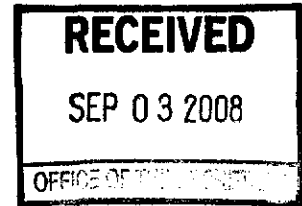




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August 26, 2008

Secretary, Securities and Exchange Commission
100 F Street NE
Washington, DC 20549-1090

RE: File Number 57-14-08

Dear S.E.C.:

In response to proposed rule 151A I would like to offer some comments.

Our firm has been marketing annuities and life insurance since 1976. We market these products on a national scale and serve the needs of several thousand independent insurance agents. We are a family-owned business and have an extremely good reputation as a company that is honest and fair to our agents. My father started the business from our home in Naperville, IL with a select few local agents and we have grown the business through the years into a respected annuity and life marketing firm. We have a staff of 12 dedicated people that count on us to provide for their families.

While I applaud the efforts of the SEC in regard to rule 151A I firmly believe Fixed Index Annuities (FIA's) should not be considered a securities product. I believe the regulation of these products needs to remain in the hands of the individual departments of insurance for each state.

First and foremost, FIA's are excellent products. They offer many advantages to consumers, including protection against market risk and income tax deferral. The value of these products has become much more apparent by the recent downturn the stock market has experienced. Consumers that own FIA's have lost no money in a time when hundreds of thousands around the country have experienced large decreases in their retirement account because they were invested directly in securities.

continued

August 25, 2008
Page Two

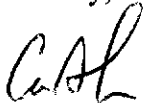
Proposed Rule 151A will make FIA's much harder to purchase due to the unnecessary layer of regulation. The majority of agents that sell FIA's are not securities licensed and will not obtain these licenses due to the large costs involved and the time commitment it would take.

Proposed Rule 151A is not legally supported. FIA's have no market-related downside risk to the consumer and therefore should not be treated as securities.

In my opinion and the opinion of hundreds of thousands of agents across the country, the criticism of FIA's has been exaggerated. The number of instances of documented abuse are miniscule and are no more than any similar abuses with any other financial product, including securities.

In conclusion, it is my hope that ultimately the SEC will allow FIA's to be sold as they are today. An extension of the comment deadline is essential to develop a complete analysis.

Sincerely,



Cameron S. Dressander
Vice President – Dressander & Associates

CSD/clw