September 3, 2008

I fully support your efforts to implement Rule 151A making indexed annuities regulated as securities. In my position, I see many of these. If it takes a trained individual, like myself, with over 35 years of

experience in the financial services industry, there is little chance of the buying public understanding these products. I only wish your Rule 151A also extended to Indexed life insurance products. Many of these are worded in such a way that I am not always sure what the issuing company is saying.

Please let me know if I can assist in any manner.

Pettus C. Gibbons, MEd, CLU, ChFC, LUTCF, AEP AVP, The Nautilus Group Advanced Sales Consultant