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Securities Exchange commission (Re proposal 151A)

I have been in the insurance business since 1972. I retired from Met-Life in 1999 as a branch manager and have remained in the insurance business since. I have sold fixed and variable annuities with Met-Life (was a registered representative) and have sold fixed indexed annuities since my retirement. I like fixed indexed annuities because they offer my clients the best of both worlds. Not only can my client 'participate' in a market index but they also have peace of mind their annuity contract will not only ever lose money, but also guarantees a minimum interest rate. I can't understand why the SEC would consider classifying a fixed indexed annuity as a variable annuity? My hope is the SEC will look this situation over very closely before making a decision.

Sincerely, Richard N. Martin

Tichard N. Martin

SEP 0 3 2009

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