Standard Financial Services

Rick Rietmann, CLU, AEP

The late agent

Granting of July

1161 WEST RIVER STREET SUITE 240 BOISE, IDAHO 83702 (208) 343-4663

September 2, 2008

SEC Headquarters 100 F Street, NE Washington, DC 20549

Re: \$7-14-08

Dear SEC,

The SEC proposal Rule 151A should not be adopted. I am certain you are aware that Index Annuities are quite similar to regular Fixed Annuities.

They are <u>not</u> like Traditional Variable Annuities.

Ext. Contract

3 May 5 . " Popular Com

Branch Burg WO

RECEIVED

SEP ∩ 9 2008

OFFICE OF THE RECRETAR

Variable Annuities necessarily put ones principal at risk due to potential market down turns. Index Annuities offer several guarantees. I won't belabor the differences between the two, buy rather ask how does limiting the Index Annuity sales to only stockbrokers provide any consumer protection?

Sufficient consumer protections are in place from a legal point of view and most companies, which sell this product (insurance companies) are well regulated and have their own standards of operation.

This product is well received by consumers for its potential yield and downside protection. Do not limit its promotion by limiting the number of sales people and thus limit consumer's access along with their ability to shop the market.

Rick Rietmann, CLU AEP

SEC Mail Processing

masmington, to