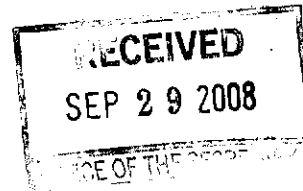


Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 50549



To Whom It May Concern:

As a registered Representative I am in agreement with Proposed Rule 151A which would make Equity Indexed Annuities a registered product. While opponents of the rule will say that an Equity indexed Annuity should be treated as a fixed annuity because the investor is "protected from downside risk", that is not the real issue.

The real issue is that Registered Representatives are held to a different standard than a non-registered producer. As an advisor, the moment I discuss a variable product I am immediately working in the capacity of a Registered Representative. For example, if a registered representative makes the recommendation to move from one mutual fund to another or from a mutual fund to a variable or fixed annuity we must provide justification and suitability for that recommendation.

With that in mind, a non-registered producer is potentially looking at the exact same mutual fund statement. If that producer then recommends that the client liquidate the fund and invest in the EIA they are by definition acting as a Registered Representative. Only they are doing so for free.

They have not taken the 6 or 7 and 63 exams. They are not overseen by the compliance requirements of a Broker Dealer. There is little/no supervision of the mutual fund transaction and its suitability. In reality, a non-registered representative should not even look at or discuss a client's mutual fund or brokerage account statement, yet it is being done every day.

Only if 100% of the funding for EIAs came from CDs and checking accounts could the non-registered argument be considered. Regarding the consumer, allowing a non-registered representative to move funds from any registered product to an EIA is contradictory to every aspect of consumer protection regarding SEC and FINRA regulation over registered products and securities.

It is time to level the playing field and ensure that all producers are held accountable to the same standards when dealing with the public and their investments.

Thank you for your consideration.

Cordially,

A Concerned RR