September 10, 2008

VIA E-MAIL and PAPER COMMENT

The Honorable Florence E. Harmon
Acting Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

RE: Proposed Rule 115A (Indexed Annuities and Certain Other Insurance Contracts)

Dear Secretary Harmon:

I am President and Chief Executive Officer of Glatfelter Insurance Group ("GIG"), a Pennsylvania-based insurance agency and broker. We conduct business in all 50 states and employ approximately 475 people. In order to better distribute the insurance products we offer and to better serve our customers, GIG operates as an insurance wholesaler, utilizing the services of several thousand local retail brokers nationwide, many of which are small businesses. A large part of the business we conduct centers on providing insurance services to both volunteer fire companies and ambulance squads as well as fire districts. The volunteer fire companies and ambulance squads are typically, but not always, small 501 (c) (3) non-profit organizations. The fire districts are tax-levying local governmental entities which operate via extensive use of volunteers. Taken together, these organizations are generally known as Emergency Service Organizations ("ESOs"). As noted above, these ESOs typically do not employ firefighters but rather utilize a group of well-trained volunteers.

One key service GIG provides to such ESOs and their volunteers is to act as an administrator of what are known as Length of Service Award Programs or "LOSAPs". A LOSAP is a pension-like benefit which is provided by ESOs to their volunteer firefighter members in order to recruit and retain such volunteers. Accordingly, a LOSAP is often viewed as being of great benefit to the local communities served by the ESO. Because the relationship between ESOs and their volunteers is generally not one of employer-employee, rather than base the LOSAP benefit on payroll compensation, which does not exist in these cases, the benefit is based upon the number of years of active volunteering activity. In addition, it is important to note that because of the lack of employer-employee relationship, these plans are non-qualified. The ESOs are often relatively risk-averse, and GIG has found they tend to appreciate the downside protection offered by group indexed annuities during times of negative performance by the index and are willing to forego full participation in the index during years of positive performance in order to always preserve both contributed capital and gain. GIG has brokered the sale of group indexed annuities as insurance products to many of these institutional ESO purchasers over a number of years utilizing our insurance licenses. These LOSAPs do not allow individual direction of investments. Rather, the LOSAP mandates all purchases be made by the institutional ESO Plan Sponsor for a common fund.

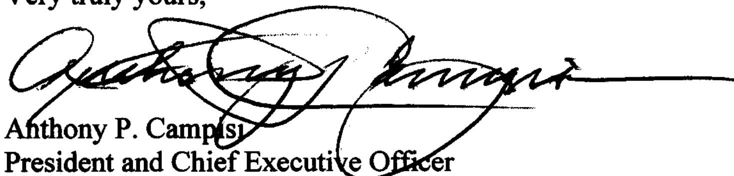
Therefore, we are writing you to offer comment regarding Proposed Rule 115A, particularly with respect to a matter which is not addressed in the materials set forth in Release Nos. 33-8933 and 34-58022 contained in File No. S7-14-08, to wit, the valid distinction which can be made between group indexed annuities and individual indexed annuities together with a suggested regulatory approach which treats group indexed annuities differently from individual indexed annuities in a way which we believe to be reasonable and necessary.

At the outset, I note that GIG understands and appreciates the concerns voiced by the SEC and others regarding matters of suitability and disclosure with respect to the sale of indexed annuities. It is our understanding, however, that those concerns have almost universally been expressed in the context of solicitations and sales to individuals. This is true, we believe, because purchasers of group indexed annuities simply do not have similar problems regarding suitability and disclosure. Group indexed annuity purchasers are institutions and typically benefit from collective knowledge and thinking and from being more sophisticated and better educated purchasers than individuals. In addition, purchasers of group annuities almost universally purchase these annuities with a fixed time horizon measured over many lives and unaltered by the vagaries of any one life, versus the time remaining in and vagaries of a single life, as is the case with an individual purchaser.

Therefore, we believe it appropriate, reasonable and useful to treat group and individual products differently in any regulatory scheme. More specifically, we urge the SEC to exempt group annuities from registration under the Securities Act in the event the Proposed Rule is adopted. In this regard, GIG submits that the SEC need look no further than its own current treatment of group variable annuities imbedded in Section 457 non-qualified plans, and Section 401 (k) and Section 403 (b) qualified plans for support of GIG's position. In these examples, group variable annuities which as individual annuities would otherwise require registration as securities under the Securities Act are treated as exempt from registration under the rationale that the institution possesses sophistication and knowledge beyond that of the individual sufficient to reasonably protect the various participants of those plans. The case at hand, which involves plans created outside the employer-employee relationship and mandates common fund purchases by the institutional ESO Sponsor, demonstrates the usefulness and reasonableness of the SEC drawing a similar regulatory distinction here. That is to say, in the event the Proposed Rule is adopted, GIG urges you to incorporate into that regulatory scheme an approach which exempts group indexed annuities held in 401 (k), 403 (b), 457, and LOSAP and similar plans, from registration for all the reasons set forth above.

Thank you for your time and consideration of our comments.

Very truly yours,



Anthony P. Campisi
President and Chief Executive Officer