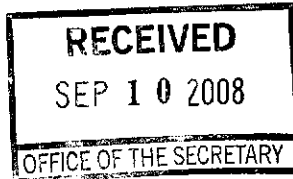



**Wisconsin Council of Life Insurers**

Parrett & O'Connell, LLP  
 10 East Doty St. - Suite 621, Madison, WI 53703  
 Phone: 608-251-1968

Allianz Life Insurance Company of North America  
 American Equity Investment Life Insurance Co.  
 Ameriprise Financial Services, Inc.  
 American Family Life Insurance Company  
 Aviva USA  
 Catholic Knights  
 CUNA Mutual Insurance  
 Equitable Reserve  
 Guardian Life Insurance Company of America  
 Genworth Financial  
 MetLife  
 National Guardian Life Insurance Company  
 Northwestern Mutual  
 Prudential Life Insurance  
 State Farm  
 Thrivent Financial for Lutherans



September 4, 2008

Florence E. Harmon  
 Acting Secretary  
 Securities and Exchange Commission  
 100 F Street  
 Washington, DC 20549

RE: Request for Extension of Comment Period for Proposed Rule 151A and  
 Proposed Rule 12h-1

Dear Ms. Harmon:

The Wisconsin Council of Life Insurers (WCLI), an organization representing both domestic and nondomestic life insurance companies licensed in Wisconsin, respectfully requests that the Securities and Exchange Commission (SEC) extend the comment period on proposed Rule 151A under the Securities Act of 1933 and proposed Rule 12h-1 under the Securities Exchange Act of 1934.

WCLI supports efforts to enhance consumer protection in the sale of annuity products. We believe an extension of the comment period is essential to assure careful consideration of a proposal with such profound potential impact on state governments, life insurers, insurance agents, and millions of consumers of financial services products.

If adopted as proposed, Proposed Rule 151A would essentially change the securities status of certain indexed and other fixed annuity contracts under the 1933 Act. We believe that such a change warrants careful study and analysis. Well-reasoned comments will be more helpful to the SEC Commission than comments designed to meet a short deadline. The Proposing Release is almost 100 pages long and poses nearly 100 questions for comment. A 90-day extension of the comment period will allow for more thorough and carefully reasoned responses which will enhance the regulatory goals articulated in the Proposing Release.


Preliminary legal assessments have opined that the Proposed Rule 151A would have significant and far-reaching consequences beyond those recognized and considered in the Release. Identifying these consequences is a considerable undertaking; this evaluation will be complex, requiring coordinated consideration of numerous legal, financial, and practical implications for the annuity industry.

Since proposed Rule 151A will have different consequences for different insurance companies, depending on their business model, the types of products they offer, and their distribution system(s) additional time is required for analysis. In addition, consideration must also be given to the impact the Proposed Rules would have on a variety of other sectors, including insurance agents and agencies, broker-dealers, state insurance regulators, state securities regulators, and of course the investing public.

An extension of the comment period will provide the SEC with better insight into the impact of the proposal and alternative approaches. We appreciate your consideration of our request.

Sincerely,

PARRETT & O'CONNELL, LLP

A handwritten signature in black ink, appearing to read "Connie L. O'Connell". The signature is written in a cursive, flowing style.

Connie L. O'Connell