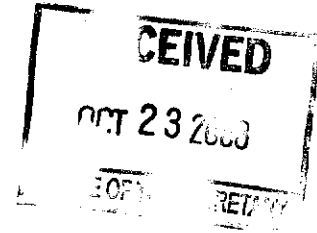


October 15, 2008

Secretary, Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549-1090



Gentlemen:

As the founder and Principal in Tarkenton Financial, LLC I wanted to write to let you know of my strong opposition to the proposed Rule 151A. Our company is represented across this great Nation by over 300 Insurance Professionals who work hard each and every day in the Insurance and Annuity business. Tarkenton Financial is dedicated to helping retirees have good options for their safe money. Today, more than ever, this is crucially important.

Fixed Index Annuities are excellent products that are a very important component of many retirees' portfolios. Never in our history of selling these products has this been more evident than in the recent plummeting of our stock markets here and abroad. Fixed annuities should not be regulated as securities as they have no market risk. I also believe that Proposed Rule 151A will be very confusing to Seniors and cause further economic disruption. It is an unnecessary layer of regulation for products that have no market related downside.

Tarkenton Financial has been helping Seniors for the past 5 years and I sincerely hope this unneeded regulation will not hinder the ability of Seniors to acquire these products, when appropriate, in the future. Requiring individuals and companies that wish to remain in this business to become licensed securities representatives is a very expensive and time-consuming process and is not legally supported.

Sincerely,

**Francis A. Tarkenton**  
CEO  
**Tarkenton Financial**