



September 5, 2008

Michael L Kosoff  
Attorney  
Division of Investment Management  
100 F Street NE  
Washington, DC 20549

Re: **Request for time to comment on Proposed Rule 151A**  
**Release Number 33-8933 (File Number S7-14-08)**

Dear Mr. Kosoff

I am an independent Minnesota insurance agent and have been for 25 years.

The proposed rule 151A recently published by the Securities and Exchange Commission would have a devastating impact on not only me and my family, but on hundreds and hundreds of my clients and their families as well as **hundreds of thousands** of other independent agents such as myself, their families as well as all of their clientele.

The SEC is seeking comments on this rule until **September 10, 2008**. This proposed ruling, 151A focuses on fixed index annuities. This is a fixed annuity regulated by each State Department of Insurance and are sold by licensed agents such as myself. The SEC wants to require all fixed index annuities to be registered products that can be sold only through a broker – dealer and not by insurance agents. This proposed ruling adds **absolutely no consumer protections** that are not already provided by state insurance regulations. It would in fact, undermine many of our state's initiatives concerning sales practices.

Do not risk the future of this country's senior citizens. Passage of this rule, would not only prevent independent agents such as myself from writing new business, but we would also not be allowed to review policies already written with our clients.

First of all, please request an extension for the comment period. Secondly, **oppose this unnecessary rule.**

Sincerely

A handwritten signature in cursive script that reads "Mark A. Clennon".

Mark A. Clennon  
Financial Consultant

**MARK A. CLENNON**

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