

Dear Ms. Barbara Sweeney:

Dear Ms. Sweeney,

I am a long time securities and insurance professional, as well as a Compliance professional, and am writing in response to the NASD's proposed rule to Impose Specific Suitability and Disclosure Requirements for Deferred Variable Annuities.

I believe the proposal creates additional paperwork which may be more confusing and burdensome on the consumer and further cause them to overlook and not read critical information, as so many of them do now. We have made such strides in disclosure rules and "plain English" text in the prospectus that if we continue in this manner and keep all required disclosures and important risk, fee, charges and redemption together in one efficient, easy to read booklet; then spend our time and effort teaching the Investor the important of this information and the "standardized" location to find it, we will be better serving the public.

I think there are many steps the SEC and the NASD can take to further enhance and highlight in the Prospectus, discussions and dangers of risk involved which are unique to this product, yet keeping the document within a simplified, all encompassing disclosure document. The NASD could be creating a nightmare for itself by taking on the role of "parent" by creating specific suitability rule for variable annuities which may snowball into specific rules for each and every other product offered by this expansive industry. This may have a reverse effect on suitability if investors are "pigeon-holed" into products, based on standards, and not given the freedoms of choice in balancing, needs, goals and just plain wants for their very own lives.

I firmly believe that people who engage in unscrupulous or misleading sales practices should be aggressively prosecuted (shot). Unfortunately, there will always be someone trying; but if our consumer is taught where to look and can read all the risks and dangers it will prevent this duplicative and burdensome proposal. Further, we must increase training to our sales force in the proper use of these products.

For these reasons, I urge the NASD to withdraw this proposal. Thank you for your consideration of my views on the matter.

Sincerely,

Deborah Jackson
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