MANULIFE FINANCIALCORPORATION
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John Nadel, Sterne Agee -
Okay. We're gonna make a relatively quick transition.

I had the pleasure of getting to know Hugh when we overlapped together back at Met, and Hugh spent many hours in my office trying to explain to me how a GMIB worked. He's since left Met and joined ManuLife at Hancock Wealth Management and is doing some terrific things up there. You know, a lot of us who spend more of our time, you know, looking at the U.S. names may miss this story, but this is a very interesting story.

And with that, I'll turn it over to Hugh.

Hugh McHaffie, John Hancock -
Thank you very much, John and Tom, for having me. I appreciate it.

I've been given actually the opportunity to talk about a real nice little growth story that John Hancock has in the United States. I have a lot of--I worked closely with Mike Farrell also, and I've got a lot of good stories, too. But, the best thing for me is revenge, quite frankly. Watching a Giants player catch a football on their head really ruined one of my days some time ago. But, Sunday was the Canadians--I am Canadian--Canadians winning the hockey game. Mike, it's back to you. Okay. I really enjoyed it.

But, you know, moving forward, I'd like to talk a little bit--there's a business that we have--I'll start with the legal disclaimer and make sure everybody reads our Safe Harbor. I think it's attached to the presentations you have on your desk.

I want to do an overview of John Hancock's 401(k) business. We are a leader in the small end of the marketplace. I'd like to talk about the potential growth in the small end of the marketplace, how we positioned our products, and, like Mike, there's a lot of things going on in Washington right now. Mike touched on a few of them. I'll overlap him a little bit, stuff that's quite active.

And then finally, you know, we have come out with some income solutions within our 401(k), much like Met is offering some products. Ours has got a totally different twist to it.

John Hancock has done very, very well in what I would call the small to the micro end of the marketplace. According to LIMRA, we are actually the number one seller of plans under 100 participants, and we have a leading share of less than 500 participants.

And that's the market that we play in. We continue to try to push up mid-market to get up to 500 lives, but we're not playing in the 10,000, 5,000 mega plans that you may see some of our mutual fund competitors play in.

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We've done this through a set of competitively-priced products, and most recently have enhanced it with a living benefit guarantee within the 401(k). But, the real cornerstone of our success has been the partnership we have with third-party administrators.

In the small plan marketplace, small plans means small businesses, small businesses generally mean small cities and towns where people like to have the local presence of a third-party administrator or a financial advisor just down the street. And that's been the cornerstone of our success, and we continue with that.

And then, finally, distribution excellence and breadth. I'll touch on this a little bit later, but we have--with all of our wealth management businesses, including our life insurance business, a significant breadth across the broker-dealer community, and we've used that to our advantage in this business line.

Talk about market share, you can see the small end of the market. We have a very, very strong market share with plans that are less than--from--less than 100 lives, having a market share in excess of 25 percent. I think what's most important--it's great having this market share, but you can see also see the impact of the economy over the last couple of years. In 2007, we wrote 2,615 plans in the smallest end of the marketplace.

And where we've seen the tightness of the economy is that we're down to just less than 1,800 plans in 2009, and that's really illustrating that, you know, start-up plans have slowed down. That would be a natural consequence because businesses are not growing.

The exciting thing for us is, as this economy comes out and as it rebounds, and as small businesses get back on their feet, we've got a good market share position, and we'll do well.

To say the least, it's sort of a quiet little story. We haven't really put it on the show--on the road yet. We've been steadily growing this business over the last 10 to 15 years, and you can see that we're up over--now over 40,000 plans in force as of the end of 2009.

Again, as you get plans on the books, these are recurring contribution products. The green in the bottom slide illustrates recurring premiums, and the gold illustrates single deposits or transfers when the plan is taken over. You can see we've had very, very strong growth in that with--in 2008, we exceeded $12 billion of premium deposits.

But, you can see a little bit of slip in 2009, and again, we're seeing participants hold back on their contributions and/or we've seen plans suspend contributions. But, you know, as the economy comes out and jobs will be created and people get more comfortable where the economy is going, we do anticipate that they continue to grow. But, it's been a nice growth pattern for us over the last decade.

And then, finally, funds under management, which obviously drives earnings in this business, almost reached $55 billion in 2007. You can see the down-tick in 2008, but the positive part is we're right back to where we were in--at the end of 2009 back to 2007 levels, which again are extremely important for earnings in this business.

And talk about earnings, you know, earnings were going along very, very nicely from 2005 to 2007. You know, your earnings basically are fee-based, so assets under management equals the revenue, and take expenses away, and you get profit at the end of the day.

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You can see the down tick in 2008 and 2009, which would be obviously expected. But, as the previous slide showed, we anticipate moving back up in earnings if the market holds for us as the asset levels have recovered.

The really nice thing about these earnings is they're steady-eddy. It's a low capital business for us. Earnings volatility is relatively benign and is an earnings stream that we'd like to grow.

Now, I'd like to make a case that this has not only been a growth business for John Hancock, but will continue to be a growth business for us. Specifically, 401(k)s continue to be the defined contribution plan of growth. You can see there's been a growth rate of 3.9 percent. That, in itself, wouldn't get an analyst too excited. It's not that high. But, we do see that contributions into 401(k)s are gonna continue to grow--are projected to grow in years to come and topping 3.8 billion--trillion dollars, excuse me--by--within the next four or five years.

But, the real exciting part for us is how the small end of the marketplace is underserved. You can see that, in plans where we play at less than 100 employees, that only 16 percent of employees have a 401(k) plan.

Now, that's probably logical. A small company is trying to get started. It's not ready quite yet to put in a defined contribution plan. But, as those companies grow and are successful, we'll be there to help them install that plan for them.

And in the 100 to 500 marketplace is relatively unserviced, so 55 percent of employers without a--with a 401(k) plan, so 45 percent without. You'll notice that the top end of the market is much more saturated. It's a part of the marketplace we currently don't compete in, and that's primarily the domain of the large mutual fund companies. So, we're excited about our growth opportunities as we go forward.

So, you know, how do we serve the small plan marketplace? As I said, you know, small plans equal small businesses. These are individuals that are running a business, decide it's good social policy to set up a 401(k) for their employees, and most importantly for themselves, and they need help setting it up.

They need help administering it. They need help answering the questions that their employees will have, and they're extremely uncomfortable hooking into a major mutual fund company that simply has a vanilla offering for them.

So, with--the strategy we took was to really hook in with third-party administrators all across the country, and again, that we would have local administrators--third-party administrators in that particular town or region, and then hook them up with a financial advisor, and then put that all together and bring a cohesive package to a plan sponsor. And it's been extremely successful for us.

The other part that we do, which many companies don't do, is we have on-site enrollment, and we have over 60 enrollers across the country. In giving that service and installing the plan, creating the plan, and then the ongoing servicing the plan by dedicating service reps to a plan sponsor so then they have someone to call to answer their questions, has been the cornerstone of our success.

And then, you can't do it without technology. Our technology 401(k) plans that have been serviced are second to none. And over the last three to four years, we invested over $30 million to improve that. So, we believe our products and our value proposition is sound.

Next, we need to have distribution. And we have significant distribution across a variety of distribution networks. As you can see here, we're almost in every single major distributor across the country, plus we do extremely well with various life insurance field forces that have opportunities for 401(k) plans but don't have the product offerings that we have.

You know, we--one in five financial advisors have done a small case 401(k) plan with John Hancock, which we're very proud of. But, most important, and you can see the penetration we've had with third-party administrators, we're almost two-thirds of TPA as part of the John Hancock Financial Services within a 401(k) plan. So, you know, capturing relationships with 2,000 of the 3,000 TPAs out across the country has been very beneficial for us.

And our distribution continues to grow. It was clear to us in 2007 that our expanding distribution opportunities were actually starting to outstrip our distribution capability. And in a market where we've seen contraction of wholesaling across a number of product lines, this was actually a business that we put our foot on the gas in increasing our external wholesaling field force from 60 up to 80 over the last couple of years.

You know, we've added firms such as Ameriprise, Bank of America, Morgan Stanley, and then most recently Edward Jones. When we bring on a firm like Edward Jones, who's got 1,200 financial representatives all across the country, and quite frankly in small towns across this country, it's a fantastic opportunity for us, and you can see why we've been expanding versus contracting.

Now, you know, we've got product. We've got distribution. You know, how do we communicate these type of products to the participants?

We've been a leader in our enrollment kits. That's where everything really happens. You get an opportunity to get in front of a participant to get them enrolled in a 401(k) plan, and you need to have easy to understand, well thought-out enrollment kits. And we have found that we were an early adapter of what I call the--like, the color coded risk options, you know, green being the conservative safe risk, red being more towards aggressive. We adopted that early on, and another part that's been very successful for us is we actually customized our enrollment kits, having either potentially to get either the industry logo or the company logo on the kit, and it's gone very, very well,

The other part is our packaging. This is a coordinated presentation by the plan sponsor affiliated with the financial advisor, and then us as John Hancock, and then bringing in the third-party administration--administrator.

It's important when you come in, if there's three or four people in the room and they're all singing from the same set of marketing literature and enrollment kits. We've done a very good job of bringing that together in that the plan sponsor can understand what it is they're buying for their participants and how we'll operate.

As I mentioned, we've brought on an income benefit--a guaranteed income benefit similar to what you see in individual variable annuities in the marketplace. I'll talk about that a little bit later.

But, one of the hearts of our value proposition is our open architecture, offering over 140 individual investment options. It's great having 140, but we have found, at the end of the day, that our lifestyle asset allocation portfolio has really been the cornerstone of our success.

We have had these portfolios in for well over a decade. They offer a multi-manager approach with diversifying asset classes, and they run from conservative to aggressive.

This has been very, very successful for us, so I've put some of our performance in the back. And I didn't want to go through them for time purposes, but you see that we've been--our funds have performed extremely well in actually one of the cornerstones we're offering across all of our wealth management businesses.

And you can see the success that these lifestyle funds have had. Through December 31st, 2009, 46 percent of our assets have been allocated to our Lifestyle Fund, which are called an asset allocation/risk tolerance portfolio.

We've taken the same expertise in multi-asset and multi-manager investment process and, you know, did Lifestyle Funds back in 2006, and that is up to $3.1 billion of assets under management. You can see that the new deposits, 12 percent are going into lifestyle and--it's 46 into lifestyle and 12 percent into life cycle, so a full 58 percent of our assets are going into what I would call our sort of prepackaged, preselected offerings.

Now, you know, there's a lot of things going on in Washington. And at the end of the day, you know, I'm personally, and our company is pleased to focus on what Washington has put on retirement preparedness.

The bottom line is individuals simply are not saving enough. And the lack of education and understanding on how their savings translates from cash into retirement income stream is simply not strong enough.

You know, looking at some statistics here, you can see that the shift--and Michael showed this, too--you know, defined contribution plans have clearly overtaken the defined benefits plans, with now 66 million people as of 2006 in defined contribution plans and 20 million people in 2006 in defined benefit plans.

But, the real challenge is, even though we have these defined contribution plans and a lot of participants, only 36 percent of workers are participating in a defined contribution plan, which is just far too low. The median account for workers is only $23,000. The median account is 50,000 for workers between 55 to 64, and the median account balance of 60,000 for ages 60 to 64.

I know there's some people here that can do some math. If you should take out 5 percent of the retirement savings for--you know, at a high end to look after your retirement income, 5 percent of 50 grand is not very much money. It's $2,500, I think, if I got my math correct.

You would have thought that the economic downturn would have brought more focus to individuals of this issue that they're facing. Still, even after the economic downturn, Charles Schwab did a survey, and 39 percent of people still are not saving. Despite the market downturn, 62 percent have not adjusted their retirement plans.

I don't know about you, but I know myself, I've already tacked an extra five years onto my working career after what's happened. But, people simply just don't get it.

And the really scary part is that, soon to retire 55 to 63 year olds actually believe and understand the need to have almost $2 million saved to have a secure retirement plan. Fifty-one percent have saved less than $500,000. So, there's quite a gap to be made up. And all of that, again, I think is--the moral of the story here is people need to continue to save more.

You know, one of the premises to people saving more--the Pension Protection Act in 2006 came out with auto-enrollment. And auto-enrollment, you know, was really to--you know, people should automatically put into these plans. They should also have automatic increases so they can save more, and that would be the solution to people saving.

Well, the reality is only 42 percent of plans are utilizing auto-enrollment. Auto-increases are only being used by a third of the plans, and this data is actually for large plans.

I looked at our book of business, and I have to tell you that our numbers are extremely low, don't even come close to these numbers, the number of small plans that are electing auto-enrollment and auto-increase. And the interesting part here is, you know, small plans quite often can't afford it. So, you know, the auto-enrollment, quite frankly, to my view is not accomplishing what it needs to accomplish.

You know, the other question that's got a lot of excitement in Washington is the Qualified Default Investment Alternative, the QDIAs that people like to talk about. You know, in 2006 three QDIAs were identified to either have a life cycle or a target date--retirement date fund, have a balance fund, or have a professionally managed account.

You know, this sort of became the birth of the current target date fund, so it became much in the focus. You know, and the goal was to have easy to understand investment programs, you know, that over-weighted equities when the participant's long away from their retirement date, and then to systemically roll out of equities into less volatile investment options as we got closer to that target date.

But, almost all target date funds have the premise that people will hold onto that fund, and that fund should stay reasonably aggressive and invest in equities and make a combination of equities and fixed income during their retirement or through their retirement, because they still had to generate returns so that people could have a decent return in their retirement years and could take an income stream for a fairly lengthy period of time.

It was all great theory, and then 2008 came by. The target date funds as a class underperformed, primarily because the diversification between equity and fixed income just didn't work, and it created an awful lot of activity. Senator Kohl wanted money managers basically to take on some heightened regulation and legal liability when acting as the fiduciary, which I--just is challenging to me to understand how that could happen, and then, you know, Mary Schapiro, the SEC Chief, calling out that, you know, these target date funds are confusing and people don't understand them.

You know, first of all, I want to note that, you know, regulation always seems to follow--many of these funds in 2009, quite frankly, recovered quite nicely, thank you. So, I think, you know, that the--you know, sticking to asset allocation has worked.

But, I also think that you're going to see, you know, the concern about the amount of volatility returns and risk taking, you know, at retirement, at the 2010 and at the 2020 date, is going to create a new marketplace--and I'll call them retire two portfolios--where the reaction in the industry is going to be provide portfolios that get much more aggressive at lowering volatility at the retirement date, and actually you'll see we've filed some of those with the SEC.

And then, that will allow the plan sponsor to offer a variety of options, be it asset allocation, risk tolerance asset allocation, target date funds that will carry someone through their retirement, or for individuals that are averse to risks nearing their retirement, an alternative.

But, also I would support Mary Schapiro, that we need to find ways to easily communicate to participants what these portfolios do, and so we actually encourage that regulation.

Washington focused on annuities also. You know, the unloved annuity gets a hug from Obama. That was an exciting day. We don't get that in the annuity world very often. You know, the middle class task force actually came out on that in alternate budgets. And the focus here is on transparency and reliability.

Looking--Washington is looking for improved transparency of 401(k) fees. They're encouraging plan sponsors to make what are called unbiased investments--provide unbiased investment advice. And then, most importantly for the insurance industry, I think, to promote the availability of guaranteed income products, which at least transform a portion of the retirement savings and the guaranteed income, reducing the risk that retirees will outlive the income.

And that goes right into the strength of insurance companies that--as Mike has said, that's, quite frankly, how we were born, was to look at these type of risks, longevity risks, life insurance risks, death risks. So, it goes right to our strength.

You know, just a few days after getting a hug, we got kind of--maybe a kick, I guess--that there's now a proposal to help fund the healthcare reform that would impose a 2.9 percent tax on unearned income, which would include annuity income. Interesting, not pension income, which was interesting--to individuals that earned over $200,000 of unearned income and/or coupled with $250,000 of annual income.

So, I don't know which way to go with this, quite frankly. It means every day there's a new leaf turned in Washington. But, stay tuned. I guess, at the end of the day, we're just excited and confident that they're starting to zero in on the real issue of how much people are saving and how can we turn that into an income stream.

And that goes to the heart of--and I'll kind of go over this a little quickly, because Mike covered the DOL request for information fairly quickly--but, you know, the RFI is really going at, you know, what are the forms of guaranteed income that could be provided? What's the legal and fiduciary structure around that, which are big, big questions.

You know, ask the question, you know, why are people not electing some of the annuity options that actually are available today in 401(k) plans. We've seen that time and time again. People do not like to annuitize their cash balance. They've been used to having--holding that cash account value, and to actually take that and annuitize it is still a challenging thing for individuals to do.

And I think one of the things that's deep in the RFI, which I personally think is a great idea and we've actually endorsed this with some of the retirement income agents that we have at John Hancock, is how to best illustrate how you take savings and take savings and turn them into retirement income? I think that disclosure is good public policy, and we're excited about that.

Secondly, you know, I will put a plug in. I think people still are not saving enough money, so any proposal that the government comes in to provide a tax advantage savings for individuals to save for retirement I think would be a good thing. And, in particular, if individuals are going to be forced into some type of retirement--guaranteed retirement income stream, it would be nice that we would increase the contribution rates to allow that to happen.

The need for this to happen is really growing. As you can see from this chart, the green represents 401(k) participants that are moving into the de-cumulation phase of their working careers. And I call it--not the de-cumulation phase--but I call it being cash rich but income poor. Many individuals are saving a substantial amount of money--they feel it's substantial money, but they simply don't understand that $500,000 is not gonna go as far or as long as they think it will.

Moving to one of the retirement income solutions that we have come up with at John Hancock, you know, we've taken the conceptual idea from the individual variable annuity world and moved it into the 401(k) world. You know, specifically, individuals have questions as to, you know, will I have enough to retire? What's a predictable goal for a year-over-year? Will my savings last through retirement? And what if something goes wrong, as in 2008, and I worked for this for 30 years, and all of a sudden my security is gone?

You know, recognizing this need was fairly obvious for us, but what was just as obvious was it needed to be much, much simpler than what's offered in the individual variability marketplace. It had to be simple. It had to be something that the participant could understand.

Ours is very simple. The participant elects one of four asset allocation portfolios, our lifestyle funds and/or one of our three American funds asset allocation portfolios. The benefit base equals deposits accrued at 3 percent compounded and is reset--the account balance gets higher when the retirement payments begin, and it guarantees an income equal to 5 percent of that guaranteed income base, whatever that might be at their retirement, after they wait for five years, and it costs 50 basis points. So, again, very simple, it's clean, and I would call it a relatively good value for the money.

So, it's--we just rolled that out about a year ago. We're getting in the neighborhood of 7 to 8 percent election rate on this option. It takes a while in this business to have these new concepts work, but we're excited about it.

You know, finally, on this product, you know, you need to address the portability issues. Many of us, I guess me included, have not stayed at one company for their entire life, and you want to carry these guarantees with you. Being that we are in the individual variable annuity business, it was obvious to us that we would have the capability that, if someone had a terminating event in the 401(k) plan, be it that the plan terminated, and/or they left their employer, and/or they're getting ready for retirement, that we would make basically the same guarantee available to them in an IRA rollover product. And that has actually gone over very well and covers a vast majority of the distributable events.

You know, one area that the industry--and I'm happy to see more insurance companies offering these second benefits--is what happens if you change the record keeper? If you just change the record keeper, it's not often a distributable event. And we have two options.

Number one, if the participant chooses, the plan the sponsor chooses, they can get a return of their last two or three years of the rider fee. But, more importantly, we're trying to work with the receiving record keeper and have them have the deal that we would retain that guarantee with John Hancock, and then they would pull that in as a stand-alone investment option, frozen at the benefit values that we've provided in their new recordkeeping system.

So, we're working hard on the portability issue. I think we've got most of that covered.

The other part--and just quickly to wrap up here--is, you know, you get into businesses, and then you find out you have another business. Plan terminations obviously were increasing, and we have our John Hancock mutual fund that offers our lifestyle funds on a retail basis. Our lifestyle funds have been very successful, perform very, very well in the 401(k) business, and it became a natural for us to educate participants that were leaving their plan that there were alternatives that they could continue with John Hancock in our retail mutual funds space.

We created an internal sales desk, and actually, we're dedicated to helping plans that terminate. It's a challenging time. Money has to move. Forms have to be filled out. So, this tele-service unit will assist participants to move their money anywhere. But, during that process, we obviously provide them access to the educational programs we have with our John Hancock funds, and we have been able to retain over the last year and a bit over $297 million of assets. And more important to me, we've processed over 16,000 rollovers. So, it's an interesting emerging little business for us.

So, in conclusion, I think you'll see that our 401(k) business is well positioned for growth. We're looking forward to assisting our participants in obtaining their retirement income goals. I think Washington's there with us.

And with that, I'll take on any questions.

John?

Q & A

John Nadel, Sterne Agee -

The first question for you is your business is so focused at the--at sort of the micro end of the market.

Who's your top competitors at that portion of the market?

Hugh McHaffie, John Hancock -

You know, the top competitors--I'll name some names. Principal is very strong in this marketplace, although they have moved up market a little bit. So, Principal's a good competitor.

Interestingly, we do compete with the major mutual funds--they have complexes--the Fidelities, the Vanguards--as they have pushed their services down to the lower end of the market. What we find is we may lose a case to some of the larger companies that are not as focused, and when they realize the value add that we bring with a local third-party administrator, a local financial advisor, we'll often see them coming back.

I would say that those are--you know, at the present time, are our biggest competitors in that end of the marketplace.

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John Nadel, Sterne Agee -
And what's the sales cycle and how long does it take?

Hugh McHaffie, John Hancock -
Well, sometimes it's the gestation of an elephant. But, you now, it's actually not as long as you think. You know, a typical case is three to four months. But, I would say five months is sort of typical.

And quite often, people like to line it up at specific dates, like for example the end of the year. So, our biggest sales month is always December as plans are wrapping up their plans and want to start off the year in a--with a brand new record keeper. So, you know, June and December are big sales months for us.

Hugh McHaffie, John Hancock -
The question was, how was our cash flow this year?

Actually, our cash flow was very strong this year. We were positive $3 billion in cash flow this year. So, you know, we've been able to retain cases. So, if you retain those cases and the ongoing recurring premiums, and if you can grow your business at a reasonable pace, you should hopefully keep positive cash flow.

Hugh McHaffie, John Hancock -
The question was, what type of return on equity are we getting on the business side?

It's actually very strong. It's one of our stronger producing product lines. So, we're very pleased with the return on equity on this product, be it either on a Canadian GAAP base or, quite frankly, a U.S. GAAP base. With either base, we've had a strong return on equity.

Yeah. Our goal is 15 to 16 percent. So, yes, it's in excess of that.

John Nadel, Sterne Agee -
If I do a sort of quick math on a couple of the slides, it looks like they're about 25, 26 basis points is the operating margin here on assets.

Hugh McHaffie, John Hancock -
John, I'll let your math hold.

John Nadel, Sterne Agee -
What is--so, you're exceeding your ROE target. So, that's the right margin or thereabouts for this--?

Mr. Hugh McHaffie -
It's strong. We're comfortable with it, and, you know, your math is reasonably close.

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Tom Gallagher, Credit Suisse -

Hugh, what are the trends in the business in terms of margins overall? Has there been any pricing pressure? You know, how high have you been able to retain assets?

We've heard from some others in the business, in order to retain assets, they've had to lower prices.

Hugh McHaffie, John Hancock -

Yeah. I think that's--you know, the pressure we see is in the larger cases. In the smaller end of the marketplace we have not seen the same level of margin squeeze, shall I say. You know, it is--you know, as these plans do grow, that becomes a bit of an issue. But, we're not experiencing the same level of squeeze, and it's primarily because we're at the small end of the marketplace, in the mid-market, and we're well entrenched there.

But, you know, as the plans get bigger, you get a little bit of squeeze in the margins. But, you know, I think we've been able to hold onto that fairly well.

Hugh McHaffie, John Hancock -

The question was, what percentage of our sales are new 401(k) plans versus transfers over?

It's a good question. Let me go back to my mind.

Startups are down quite a bit, so I do know that 80 percent of our premium deposits in 2009 were transfers. So, I suspect that, you know, if you take those over that--you know, well in excess of 50 percent are transfers, I'd say well in excess. Also, you know, with the small plans, you know, germinations slow down because of the economy. So, you know, we're generally securing, you know, the vast majority of our business from the 401(k) plans.

Tom Gallagher, Credit Suisse -

And then, I guess finally for you, so, small market focus is clearly evident here. Is there any desire at Hancock or Manulife to go up market?

And if you were to do that, is that something that would have to happen via acquisitions?

Hugh McHaffie, John Hancock -

The desire to go up market--we'd like to get out of the micro market and get more into the mid-market. And I was just showing that slide. There's a lot of opportunity for us there. So, that's really our focus right now, is to try to move these--this product up mid-market, and then we think we'll be successful at that.

You know, getting into the higher end of the marketplace, you know, it's--you know, margins are a little tighter in that business. We have a proprietary money management firm, MFC Global, which was does very well within our product line, but we don't have the same breadth of investment offerings that you would see in a major mutual fund that's in the large end of the marketplace.

So, I never say never. You know, we look at that, but our clear focus is trying to get further up into the mid-market range.

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