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# United States Senate

WASHINGTON, DC 20510-1401

September 8, 2008

Mr. Jonathan Burks  
Director of Legislative Affairs  
Securities and Exchange Commission  
450 Fifth Street NW, Rm. 6100  
Washington D.C., 20549

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Office of Legislative and Intergovernmental Affairs

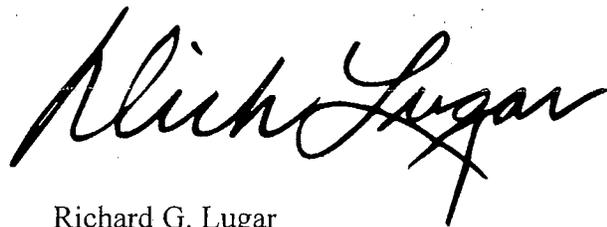
Dear Mr. Burks:

Because of the desire of this office to be responsive to all inquiries and communications, your consideration of the attached is requested.

Your findings and views, in duplicate form, along with the return of the enclosure, will be greatly appreciated. Please direct your reply to the attention of Darlee McCollum of my Washington office.

Thank you for your thoughtful attention.

Sincerely,



Richard G. Lugar  
United States Senator

RGL/cgd  
Enclosure

**Lugar, Senator (Lugar)**

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**From:** Westeverd@aol.com: 57  
**Sent:** Tuesday, September 02, 2008 5:08 PM  
**To:** Lugar, Senator (Lugar)  
**Subject:** Rule 151a

Rule 151a is proposed by the SEC. It would require fixed indexed annuities to be registered with them as a security product. The current members, the Broker Dealers, do not currently allow their registered representative to sell these product, why, because the do not share in the commission.

These products have guarantees for the client, it allows them to share in the return of the Index, such as the S&P 500, without the risk of the down market.

I had a series 7 securities license for 35 years and gave it up to provide these products to my clients. Broker Dealer will not allow the sale of these products; why should the SEC want to be registered products?

I am against this rule and I hope your are also.

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