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Honorable Christopher Cox, Chairman
U. S. Securities and Exchange Commission
100 F. Street N.E.
Washington, D.C. 20549-1090

Submitted via email on SEC website
September 5, 2008

Re.: Request for Extension of Time for Comments for Proposed Rule on Indexed Annuities and Certain Other Insurance Contracts: File No. S7-14-08; Release Nos. 33-8933 and 34-58022

Dear Chairman Cox:

The Lafayette Life Insurance Company ("Lafayette Life") joins the many voices which are respectfully requesting the SEC to extend the comment period for Proposed Rule 151A for at least an additional 90 days until December 9, 2008. Lafayette Life plans to offer what we believe will be helpful commentary on the Proposed Rule. Like many, while we have been working diligently to prepare our comments, we will require at least an additional 90 days to carefully consider, analyze, and formulate a reasoned response to the SEC's far-reaching 96 page release, with the nearly 100 questions it poses.

There is a clear and compelling need to allow a more reasonable period of time for careful review, analysis, and commentary, from all stakeholders, given the complex, sweeping, and controversial nature of the Proposed Rule. The Rule proposes to change the securities status under the 1933 Act of virtually all fixed indexed annuity contracts, and even threatens the status of the more traditional fixed annuity products. It would fundamentally alter the basic legal test used for many years to determine whether these annuities qualify for the statutory exclusion set forth by Congress in Section 3(a)(8). Such a proposal, with its wide-ranging implications, calls for sufficient time for thorough review.

We are not alone in our request for additional time to comment. Many convincing reasons for an extension period have already been put forth in hundreds of comments received by the SEC from a wide and diverse group of stakeholders, including as a sample:

- Members of Congress,
- The American Council of Life Insurers
- The National Conference of Insurance Legislators
- The American Academy of Actuaries
- NAVA, Inc., the Association for Insured Retirement Solutions
- The National Association of Insurance Commissioners
- Individual state insurance regulators (including our domiciliary regulator, James Atterholt, Commissioner of the Indiana Department of Insurance)
- Leading law firms, insurance companies, agents, consumers, and other members of the public.

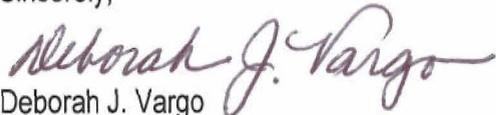
Such a uniform and extensive call for additional time should be heard and granted.

While we concur in their persuasive comments already offered, we will not reiterate them here. Rather, we would like to offer that our comments will provide the insight and experience of Lafayette Life, a top-rated, 103-year old company, which has for many years very successfully and responsibly developed and sold valuable and consumer-friendly fixed indexed annuities, using appropriate marketplace practices, operating under effective state insurance regulation. Our customers have benefited from these valuable products, and future customers would be harmed by the significant additional and unnecessary costs and burdens of declaring these products to be securities.

We strongly urge the SEC to allow all concerned commentators time to share their best, comprehensive input to assist the SEC in this effort.

Thank you for your consideration of this request.

Sincerely,

A handwritten signature in cursive script that reads "Deborah J. Vargo".

Deborah J. Vargo
Senior Vice President, General Counsel, and Corporate Secretary