

June 2, 2009

Office of Regulations and Interpretations
Employee Benefits Security Administration
Room N-5655
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210

Attn: Target Date Fund Joint Hearing

Dear Ladies/Gentlemen:

Barclays Global Investors, N.A. hereby requests to appear at the Joint Hearing of the Department of Labor and Securities and Exchange Commission on Target Date Funds and Similar Investments Options to be held in Washington, D.C. on June 18, 2009. BGI will be jointly represented by Kristi Mitchem, Managing Director and Head of Defined Contribution and Chip Castille, Managing Director and Head of Defined Contribution Product Development. Short biographies of Ms. Mitchem and Mr. Castille are attached.

BGI is one of the world's largest institutional asset managers, and is the largest provider of structured investment strategies, such as index, tactical asset allocation and quantitative active strategies. BGI pioneered the first institutional index fund strategy in 1971, and has continued a tradition of financial innovation ever since—including the development of target date funds in the early 1990's.

We understand that generally the time allotment for each oral presentation will be 10 minutes. BGI expects that it will focus its presentation on two topics: using its own experience as an example, how managers determine asset allocations and changes to asset allocation (including glide paths)(approximately 7 minutes) and the factors for comparing and evaluating TDFs (approximately 3 minutes). BGI's written statement will also include its views on what disclosures concerning the operations and risks of target date funds are appropriate for plan sponsors and/or plan participants. At the hearing we would be pleased to respond to questions on any of these topics.

If you have any questions concerning this request, please do not hesitate to contact me at (415) 597-2620.

Sincerely



Cc: Tara Buckley (SEC)

Kristi Mitchem

Managing Director, Head of US Defined Contribution, Barclays Global Investors

Kristi Mitchem is the head of BGI's US Defined Contribution business. Prior to this role, she was head of BGI's US Transition Services Group. With more than ten years of experience in the industry, Kristi joined BGI from Goldman Sachs where she ran both the West Coast Derivatives Group as well as US Transition Services. During her tenure with Goldman Sachs, Kristi also served as co-head of US Portfolio Trading. Prior to joining Goldman Sachs in 1997, Kristi worked within the Latin American Investment Banking Group at CS First Boston. Kristi received her MBA from the Stanford Graduate School of Business and her BA in political science from Davidson College.

Chip Castille

Managing Director, Head of US Defined Contribution Product Development

Chip Castille is head of product development for BGI's US defined contribution business. Previously, he was managing director of Wilshire Associates and chief investment officer for Wilshire Funds Management. He has over 15 years of investment management experience, including expertise in solving asset allocation, manager selection, and structure problems. Along with John Pirone and Duane Whitney, Chip co-authored 'Optimizing Manager Structure and Budgeting Manager Risk,' which was published in the Journal of Portfolio Management and received the Bernstein Fabozzi/Jacobs Levy award for outstanding article in 2000. He holds a MBA from Loyola University and a BA in journalism from Louisiana State University.