MEMORANDUM

November 6, 2008

From: Keith Carpenter Keith Communication Office of Disclosure and Insurance Products Regulation

Division of Investment Management

Re:

Indexed Annuities and Certain Other Insurance Contracts - Release No. 33-8933

On November 5, 2008, John Fahey and Sheila Swartz of the Division of Trading and Markets, and I, spoke by telephone with Stewart Gregg of Allianz Life Insurance Company of North America and Angela Wilson of Allianz Life Financial Services, LLC, regarding the comment letter to the Commission from Mr. Gregg dated September 10, 2008, regarding the above-captioned proposal.