

MEMORANDUM

December 8, 2008

To: File No. S7-14-08

From: Scott H. Kimpel
Office of Commissioner Troy A. Paredes

Re: Indexed Annuities and Certain Other Insurance Contracts

On December 8, 2008, Commissioner Troy A. Paredes and Scott H. Kimpel, Counsel to the Commissioner, met with the following representatives of Aviva USA: Christopher Littlefield, Executive Vice President and Chief Operating Officer, Aviva USA; Michael H. Miller, Executive Vice President, General Counsel and Secretary, Aviva USA; Stephen E. Roth, Sutherland Asbill & Brennan LLP; and Pamela K. Ellis, Sutherland Asbill & Brennan LLP. The participants discussed proposed rule 151A.