



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

April 7, 2014

Via E-mail

Annabel Barker
Group Reporting Director
Aviva PLC
St. Helen's, 1 Undershaft
London EC3P 3DQ, England

Re: Aviva PLC
Form 20-F for Fiscal Year Ended December 31, 2012
Filed March 25, 2013
File No. 1-34486

Dear Ms. Barker:

We refer you to our comment letter dated March 10, 2014 regarding business contacts with Cuba, Sudan and Syria. We have completed our review of this subject matter. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Cecilia Blye

Cecilia Blye, Chief
Office of Global Security Risk

cc: Jeffrey Reidler
Assistant Director
Division of Corporation Finance

Joseph D. Ferraro
Willkie Farr & Gallagher (UK) LLP