



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

DIVISION OF  
CORPORATION FINANCE

Mail Stop 4546

February 13, 2017

Lynn A. Dumais  
Vice President and Chief Financial Officer  
First MetLife Investors Insurance Company  
200 Park Avenue  
New York, NY 10166-0188

**Re: First MetLife Investors Insurance Company  
Form 10-12G  
Filed October 14, 2016  
File No. 000-55705**

Dear Ms. Dumais:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

/s/ Suzanne Hayes

Suzanne Hayes  
Assistant Director  
Office of Healthcare and Insurance

cc: Benjamin Nixon  
Willkie Farr & Gallagher LLP