

November 5, 2009

VIA U.S. MAIL  
Thomas J. Loftus, Esq.  
John Hancock Life Insurance Company  
601 Congress Street  
Boston, MA 02210-2805

Re: John Hancock Life Insurance Company (U.S.A) ("JHUSA")  
Separate Account H  
Initial Registration Statement on Form N-4  
File Nos. 333-162245 and 811-4113

John Hancock Life Insurance Company of New York ("JHNY")  
Separate Account A  
Initial Registration Statement on Form N-4  
File Nos. 333-162244 and 811-6584

Dear Mr. Loftus:

The staff has reviewed the above-referenced joint registration statement which the Commission received on October 1, 2009, and which you amended on October 16, 2009. Based on your representation that the filing is substantially similar to File Nos. 33-79112 and 333-70728, filed on May 7, 2009, the registration statement received a selective review. Based on this review, we have the following comments on the filing:

1. General

- a. Please confirm that the contract name on the front cover page of the prospectus will continue to be the same as the EDGAR class identifier associated with the contract.
- b. Please clarify supplementally whether there are any types of guarantees or support agreements with third parties to support any of the company's guarantees under the policy (other than reinsurance agreements) or whether the company will be solely responsible for paying out on any guarantees associated with the policy.
- c. Please include additional prospectus disclosure describing the relationship between the guarantees under the contract, and the claims paying ability of the company and its general account.

2. Overview, page 4

Please disclose that the prospectus describes all material features and benefits of the contract.

3. What are some benefits of the Contract?, page 4

Since there is more than one guaranteed minimum withdrawal benefit, please change "an optional guaranteed minimum withdrawal benefit" to "optional guaranteed minimum withdrawal benefits" in the first sentence of the first paragraph of this section.

4. Total Portfolio Operating Expenses Tables and Expense Examples, pages 11-14

As the waivers described in footnotes 6, 7, 9 and 15 to the portfolio's expense table on pages 12-14 do not extend at least a year beyond the date of the prospectus, please do not reflect them in the tables or expense examples.

5. Exhibits - Powers of Attorney

It is unclear why the Powers of Attorney refer to the contract as the Venture 4 Variable Annuity instead of the Venture 2010 Variable Annuity. See Rule 483(b) of the Securities Act of 1933 and revise.

6. Exhibits - Guaranteed Minimum Withdrawal Benefit Rider and Spousal Guaranteed Minimum Withdrawal Benefit Rider

Please explain why the provisions of the riders disclosed in the exhibits appear to differ from those described in the prospectus.

7. Tandy Comment

We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings reviewed by the staff to be certain that they have provided all information investors require for an informed decision. Since the fund and its management are in possession of all facts relating to the fund's disclosure, they are responsible for the accuracy and adequacy of the disclosures they have made. Notwithstanding our comments, in the event the fund requests acceleration of the effective date of the pending registration statement, it should furnish a letter, at the time of such request, acknowledging that

- should the Commission or the staff, acting pursuant to delegated authority, declare the filing effective, it does not foreclose the Commission from taking any action with respect to the filing;

- the action of the Commission or the staff, acting pursuant to delegated authority, in declaring the filing effective, does not relieve the fund from its full responsibility for the adequacy and accuracy of the disclosure in the filing; and
- the fund may not assert this action as defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

In addition, please be advised that the Division of Enforcement has access to all information you provide to the staff of the Division of Investment Management in connection with our review of your filing or in response to our comments on your filing.

We will consider a written request for acceleration of the effective date of the registration statement as a confirmation of the fact that those requesting acceleration are aware of their respective responsibilities. We will act on the request and, pursuant to delegated authority, grant acceleration of the effective date.

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Responses to these comments should be made in a letter to me and in a pre-effective amendment to the registration statement. If you believe that you do not need to change the registration statement in response to a comment, please explain your position in the letter.

Although we have completed our initial review of the registration statement, it will be reviewed further after our comments are resolved. Therefore, we reserve the right to comment further on the registration statement and any amendments to it. After we have resolved all issues, both the registrant and its underwriter must request acceleration of the effective date of the registration statement.

If you have any questions, please phone me at (202) 551-6751. Mail or deliveries should be addressed to 100 F Street, NE, Washington DC 20549-8629.

Sincerely,

Alison White  
Senior Counsel  
Office of Insurance Products