



DIVISION OF  
INVESTMENT MANAGEMENT

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

August 21, 2015

**VIA ELECTRONIC MAIL**

Thomas Conner, Esq.  
Reed Smith LLP  
Suite 1100 – East Tower  
1301 K Street, N.W.  
Washington, D.C. 20005-3373

RE: First MetLife Investors Insurance Company:  
First MetLife Investors Variable Annuity Account One  
Class O (offered on and after \_\_\_\_\_, 2015)  
Initial Registration Statement filed on Form N-4  
File Nos. 811-08306 and 333-205137

Dear Mr. Conner:

The staff reviewed the above-referenced initial registration statement, which the Commission received on June 22, 2015. We have given the registration statement selective review. Based on our review, we have the following comments. Unless noted otherwise, page references are to the pages in the marked courtesy copy of the prospectus provided to the staff on June 23, 2015, and Item references are to the item numbers set forth in Form N-4.

**GENERAL**

1. Please confirm that the date of the prospectus will be the same as or about the date of effectiveness.
2. Please confirm that the EDGAR series/class identifiers will appropriately be revised prior to effectiveness of the registration statement.

**PROSPECTUS**

**3. Highlights (page 5)**

Please disclose that you must be at least 62 years old at contract issue to purchase the GLWB benefit and disclose the actual Minimum Issue Age in the paragraph preceding the “Summary of the GLWB” on page 38.

**4. Federal Income Tax Status (page 51)**

Please confirm this section and the “Additional Federal Tax Considerations” section beginning on page 3 of the SAI are current and accurate.

**5. Exhibits**

Please revise the powers of attorney submitted as exhibit 13 so that they specifically relate to this filing as required by Rule 483(b) under the Securities Act of 1933.

Please also include powers of attorney for Directors Kessler and Mullins or confirm they have individually signed this registration statement.

**6. Financial Statements, Exhibits, and Certain Other Information**

Any financial statements, exhibits, and any other required disclosure not included in this registration statement must be filed by pre-effective amendment to the registration statement.

**7. Representations**

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 registrant is in possession of all facts relating to the registrant's disclosure, it is responsible for the accuracy and adequacy of the disclosures it has made.

Notwithstanding our comments, in the event the registrant 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 registrant from its full responsibility for the adequacy and accuracy of the disclosure in the filing; and
- the registrant may not assert this action as a 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.

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Responses to these comments should be made in a letter to the staff 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 indicate that in the letter and explain your position.

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, the registrant and its underwriter must both request that the effective date of the registration statement be accelerated.

If you have any questions, you are welcome to call me at (202) 551-6767. Mail or deliveries should include reference to Mail Stop 8629 and should include all nine digits of the following zip code: 20549-8629. My facsimile number is (202) 772-9285.

Sincerely,

/s/ Sonny Oh

Sonny Oh  
Senior Counsel  
Insured Investments Office