

MEMORANDUM

October 23, 2008

To: File No. S7-14-08

From: Michael Kosoff *MK*
Office Insurance Products
Division of Investment Management

Re: Indexed Annuities and Certain Other Insurance Contracts –
Release No. 33-8933

On October 22, 2008, Susan Nash, Keith Carpenter, and Michael Kosoff met with the following representatives of the American Academy of Actuaries: Noel Abkemeier, Consulting Actuary, Milliman, Inc.; David Sandberg, Vice President and Corporate Actuary, Allianz Life Insurance Company of North America; Craig Hanna, Director of Public Policy, American Academy of Actuaries; and Natalie Jones, Life Policy Analyst, American Academy of Actuaries. The American Academy of Actuaries' representatives discussed comments made in the American Academy of Actuaries' comment letter dated September 10, 2008 on the above-referenced proposal.