

## MEMORANDUM

TO: Proposed Rule: Updated Disclosure Requirements and Summary Prospectus for Variable Annuity and Variable Life Insurance Contracts (Release No. IC-33286; File No. S7-23-18)

FROM: James Maclean  
Senior Counsel, Division of Investment Management

RE: Meeting with Representatives of Brighthouse Financial

DATE: May 17, 2019

---

On May 15, 2019, Paul Cellupica (Deputy Director and Chief Counsel, Division of Investment Management (“IM”)), Brian M. Johnson (Assistant Director, IM), Bill Kotapish (Assistant Director, IM), Michael Kosoff (Senior Special Counsel, IM), Keith Carpenter (Senior Special Counsel, IM), Harry Eisenstein (Senior Special Counsel, IM), Michael Pawluk (Senior Special Counsel, IM), Sumeera Younis (Branch Chief, IM), Dan Chang (Senior Counsel, IM), James Maclean (Senior Counsel, IM), Amy Miller (Senior Counsel, IM), and Dan Deli (Financial Economist, Division of Economic and Risk Analysis) met with the following representatives of Brighthouse Financial:

- Michele Abate, Vice President & Associate General Counsel, Head of Securities Products Law
- Alan Assner, Business Head of Product Development
- Norah Jones, Director, Government Relations
- Dodie Kent, Partner, Eversheds Sutherland
- Ron Coenen, Associate, Eversheds Sutherland

Among other things, the participants discussed the SEC’s proposal relating to updated disclosure requirements and a summary prospectus for variable annuity and variable life insurance contracts.