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To our Distribution Partners and Producers:

Since the SEC's proposed rule 151A was announced on June 25, 2008, I have talked with a number of you regarding the many questions raised by the proposal. As a result, I wanted to take a moment to provide you with Aviva's perspective on this matter.

Valuable product for consumers

First and foremost, indexed annuities are unique, valuable products that fill an important financial need for many consumers. And today's extremely volatile markets underscore the need for such a product. Accordingly, we plan to offer these products for the indefinite future.

Valued distribution partners

Aviva is represented by some of the best and the brightest IMOs and agents in the industry who play an important role in helping consumers meet their financial planning needs and ensure that they fully understand product features and pricing. We take great pride in our reputation, and we have adopted stringent requirements to sell Aviva products and provide continued education to help IMOs and agents determine the suitability of our products for their clients. We are confident that together Aviva and our outstanding distribution partners will successfully navigate through this time of potential regulatory change.

SEC comment period

Aviva is now reviewing the proposed rule and will soon provide comments to the SEC that will **clearly articulate our view that indexed annuities are insurance products that are effectively governed by state insurance regulators – and should not be subject to SEC regulation.**

As you know, we are far from alone in this view. Many state insurance regulators and other parties have already begun to express their concerns over the SEC proposal.

In a recent article, Iowa Insurance Commissioner, Susan Voss, said about the SEC proposal, "I'm very disturbed by it . . . This is not [a product] where the risk is going to fall on the investors. The investor is going to get paid. Insurers guarantee repayment of principal through their general funds, which insurance regulators oversee."¹

As Aviva articulates our perspective on this matter, we will share our comments with you.

Planning for the future

As you well know, no business environment is ever static. We must regularly adapt to meet the evolving needs of consumers and the intermediaries that serve them. Accordingly, while we will work closely with the SEC to ensure they are aware of our perspective and the inherent value that fixed annuities play in a financial plan, we must be prepared for any and all outcomes.

Therefore, reflecting our obligation as an industry leader and business partner, we will simultaneously work to ensure that Aviva and our producers are in a position to effectively adapt to any new requirements that may arise from the SEC proposal. Along these lines, we are currently updating our

¹ *Investment News*, July 14, 2008

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traditional fixed annuity products to make sure that you have access to the products you require to continue to meet your clients' needs.

It is important to note that even *if* the SEC should approve rule 151A sometime after the comment deadline (September 10, 2008), the proposal is not expected to be enacted until 12 months from the date of approval. Given our strong history of product innovation and agent support, we are confident in our ability to implement a transition plan, ensuring continued support of Aviva's distribution partners and preventing disruption to your customers and business.

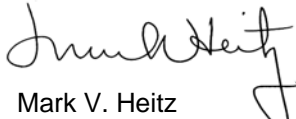
Continuing to Meet the Needs of Consumers

Our fixed index annuities continue to meet the needs of many consumers, and we encourage you to continue to offer them in their current form to clients for whom they would be a valuable and suitable component of their financial plan.

Aviva will maintain an open dialogue with you throughout the SEC comment and review period. Please do not hesitate to contact us with any concerns or questions. And, stay tuned for updates throughout this process.

Thank you for your ongoing commitment to Aviva and to your customers—we look forward to continued success.

Sincerely,



Mark V. Heitz
President, Sales and Distribution
Aviva USA