



Aviva USA
Position on SEC proposed rule 151A

July 7, 2008

We strongly believe that indexed annuities are insurance products, not securities. We also believe that state insurance departments are doing an effective job in regulating these products, ensuring clear disclosure of product features and providing appropriate oversight of sales practices.

Indexed annuities are valuable products that fill an important financial need for many consumers and we expect indexed products to be an important part of our product offering for years to come even if the SEC proposed rule is ultimately adopted.

We will submit comments to the SEC on proposed rule 151A and will work to ensure an effective outcome for our producers and customers.