



Aviva Life and Annuity Company 7700 Mills Civic Parkway West Des Moines IA 50266-3862 Tel 800 800 9882 Fax 800 531 0038
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August 16, 2010

To: United States Department of Labor

Re: Request to Testify at DOL/IRS Hearing on Lifetime Income

Dear Sir or Madam:

Aviva USA respectfully requests the opportunity to testify at the combined Department of Labor and Department of Treasury Lifetime Income Joint Hearing planned for Sept. 14-15, 2010.

Aviva USA is part of Aviva plc – the world's fifth largest insurance group – and is a sales leader of fixed indexed annuities and fixed indexed life insurance. Based in Iowa, with offices in West Des Moines, New York and Kansas, Aviva USA has approximately one million customers and employs nearly 1,500 people across the country. We can trace our presence as a financial services provider in the United States to the late 1800s.

Speaking on behalf of Aviva USA will be Rhonda Elming, senior vice president of product management. In her address to the committee, Ms. Elming will focus her comments on issues No. 1 and No. 5 as set forth in the Notice of Hearing released on August 10, 2010. We will testify about:

- **Participant Concerns (3 minutes)** – Discussion of key reasons that lifetime income options have not been attractive to participants. Experience shows that participants are reluctant to choose lifetime income options that require a large portion of savings to become inaccessible with no or low death benefits, a lack of flexibility of withdrawals, and without access to the investment corpus should their financial situation change.
- **The Design of Lifetime Income Options (7 minutes)** – We will review the current lifetime income options available in the marketplace that combine the stability and safety of fixed annuities with the peace of mind of an income stream that cannot be outlived. The life insurance industry is experienced in managing mortality and investment risks and is uniquely positioned to offer lifetime income guarantees. We will discuss the industry's continued innovation and development of products that solve the pressing need for lifetime income guarantees.

Aviva USA appreciates your consideration of our request to testify. We welcome the opportunity to provide insights into this important initiative. Should you have any questions, please contact Kevin Waetke (kevin.waetke@avivausa.com) or Rich Cohan (rich.cohan@avivausa.com). Both can be reached by phone at 800-800-9882.

Sincerely,

A handwritten signature in dark ink, appearing to read "Richard Cohan", with a horizontal line extending to the right.

Richard Cohan
SVP and Acting General Counsel