Comments from John Robinson FSA, FCA, MAAA - Minnesota Department of Commerce

1. Since the contract will allow Separate Accounts, the term “FIXED” in the title should be removed.

2. In Section 3, I suggest that a definition of “Immediate Annuitant” be added.

3. The definitions of “Contingent Annuitant” (Section 3.(5)) and “Beneficiary” (Section 3.(4)) are substantially the same. Please clarify the difference.

4. According to Section 3.(1), the Annuitant is not defined as an owner of an annuity. This is appropriate since the Annuitant is a certificateholder. Therefore, for the same reason, the Joint Annuitant (Section 3.(8)) should not be referred to as a co-owner.

Thank you.

John Robinson