MEMORANDUM

TO: File

FROM: Leah Drennan

RE: Meeting with representatives of the National Association of Insurance

Commissioners

DATE: October 5, 2010

On October 5, 2010, Leah Drennan and Matt Daigler of the Securities and Exchange Commission ("SEC") and David Aron, Gregory Kuserk, Stephan Kane, Julian Hammar, and Rose Troia of the Commodity Futures Trading Commission ("CFTC") met with Mark Sagat (National Association of Insurance Commissioners ("NAIC")), Edward L. Toy (NAIC), Todd Sells (NAIC), and John Englehart (NAIC) (collectively the "NAIC representatives").

The NAIC representatives offered their views on stable value contracts generally and answered a number of questions regarding stable value contracts.

