

September 21, 2007

Ms. Sally Samuel, Esq.
Office of Insurance Products
Division of Investment Management
United States Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549

RE: Post-effective amendments to certain Form S-3 registration statements

Dear Ms. Samuel:

We are filing this letter under Rule 477 of the Securities Act of 1933 to request the withdrawal of two Form S-3 filings that were filed yesterday with the Commission in error. The file numbers for these Form S-3s are 33-61143, 333-62246 and 333-103473. Although securities may have been sold since yesterday under the currently-effective version of these Form S-3s, we have not sold any securities based specifically on these erroneous filings. We apologize for any inconvenience associated with these inadvertent filings.

Sincerely,

/s/C. Christopher Sprague
C. Christopher Sprague