

Michaelanne Ehrenberg  
Vice President and Associate General Counsel  
Symetra Life Insurance Company  
777 108th Avenue NE, Suite 1200  
Bellevue, WA 98004-5135  
Phone 425.256.8764  
michaelanne.ehrenberg@symetra.com



April 22, 2014

Gayle Pasero  
Company Licensing Manager  
Company Supervision Division  
Washington State Office of the Insurance Commissioner  
5000 Capitol Blvd. SE.  
Tumwater, Washington 98501

Re: Summary Statement Concerning Redomestication of Symetra Life Insurance Company  
and Symetra National Life Insurance Company

Dear Ms. Pasero:

As requested, this letter provides background information regarding the proposed redomestication of Symetra Life Insurance Company ("Symetra Life") and Symetra National Life Insurance Company ("Symetra National"), each a Washington stock insurance company (collectively, the "Applicants"), to the state of Iowa.

Symetra Life is a direct, wholly-owned subsidiary of Symetra Financial Corporation ("Symetra Financial") (NYSE: SYA), which is a diversified financial services company based in Bellevue, Washington. Symetra Life's principal products include medical stop-loss insurance, fixed deferred annuities, single premium immediate annuities, universal life insurance, including single-premium life and bank-owned life insurance, and term life insurance. These products are distributed through a national network of benefits consultants, financial institutions and independent agents.

Symetra National is a direct, wholly-owned subsidiary of Symetra Life. It has sold no new business since 1988, and maintains a legacy block of individual life insurance policies.

On January 14, 2014, Symetra Life filed applications with the Washington State Office of the Insurance Commissioner ("Washington OIC") and the Iowa Insurance Division ("IID") to redomesticate from the state of Washington to the state of Iowa. Similar applications were filed on behalf of Symetra National on February 6, 2014. All of the applications were filed in accordance with the Uniform Certificate of Authority Application (UCAA) process and materials promulgated by the National Association of Insurance Commissioners.

As further set forth in the applications for redomestication, we believe that redomestication to Iowa will further our efforts to grow and diversify our product portfolio and risk profile by permitting us to take advantage of the statutes and regulations governing the life

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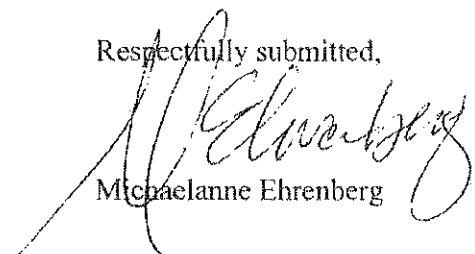
insurance industry in Iowa, including Iowa's legislation that allows the enforcement of derivative netting provisions in the event of insurer insolvency. We also expect the redomestication to Iowa to benefit our competitiveness through enhanced capabilities to offer product features and benefits. We do not expect the change in domicile to affect existing policyholders in the state of Washington or elsewhere. To date, no existing policyholders have expressed any concerns to us concerning the proposed redomestication.

Following the redomestication, Symetra Financial will maintain its corporate headquarters in Bellevue, Washington, which includes nearly 900 employees. In this regard, please note that Symetra Life recently renewed its lease for its office space in downtown Bellevue through July 2025. In conjunction with the redomestication, Applicant will open an office in Des Moines, Iowa. Applicant anticipates staffing the office with 20-40 employees over the next two to four years.

We look forward to scheduling a hearing in accordance with RCW 48.07.210 following your determination that the redomestication applications are complete. The Applicants respectfully request that the transfer of their domiciles to Iowa be effective no later than July 1, 2014.

If you have any additional questions regarding this proposed redomestication, please do not hesitate to contact me.

Respectfully submitted,

  
Michaelanne Ehrenberg