



February 10, 2017

Via email: Rebecca.rebholz@wisconsin.gov

Rebecca Rebholz
State of Wisconsin, Office of the Commissioner of Insurance
Bureau of Market Regulation
125 South Webster Street
Madison, Wisconsin 53707

Re: Market Conduct Examination
Athene Annuity and Life Company

Dear Ms. Rebholz:

We are in receipt of your letter dated January 24, 2017, providing a copy of the proposed report of the market conduct examination performed on Athene Annuity and Life Company. We have reviewed the proposed report and would like to provide the following comments.

During our telephone conversation on February 9, 2017, we discussed recommendation 5 listed in the proposed report. As discussed, the Department has reconsidered the recommendation to include questions related to financial time horizon on the suitability form. A subsequent review of the Company's suitability form has found the form complies with the requirements of s. 628.347 (1)(e) 7.; therefore, no additional action is required for this item.

In addition, we also discussed the Company's plans to include a question relating to age on the suitability form. By requesting the applicant's date of birth on the suitability form, the Department indicated we will satisfy the requirements of s. 628.347 (1)(e) 1.

The Company will provide a detailed corrective action plan for each of the recommendations listed in proposed report on a later date.

We have no further comments or revisions to the proposed report and accept the proposed report with consideration to the comments provided above.

As permitted under s. 601.44 (6), the Company reserves the right to request a hearing on a later date.

Should you have any questions, please contact me directly at mryan@athene.com or by telephone at (515) 342-2929.

Sincerely,

A handwritten signature in cursive script that reads "Marie Ryan".

Marie Ryan
Compliance Analyst
Athene USA

Cc: John Kitslaar
Janelle Dvorak