

September 21, 2018

Via Electronic Delivery and FedEx

Commissioner Theodore Nickel
Wisconsin Office of the Commissioner of Insurance ("OCI")
125 South Webster Street, 2nd Floor
Madison, WI 53703-3474

ATTN: Mr. Michael Mancusi-Ungaro
Company Licensing Specialist
Bureau of Financial Analysis and Examinations

Re: Transmission of TLIC Form A and Exhibits (Including Plan of
Dissolution)

Dear Mr. Mancusi-Ungaro,

On behalf of Thrivent Financial for Lutherans ("TFL"), please find attached TFL's application for the acquisition of Thrivent Life Insurance Company ("TLIC") pursuant to a dividend of all of the shares of TLIC from Thrivent Financial Holdings, Inc. ("Holdings") to TFL (the "Form A"). We note that the Plan of Dissolution (and the exhibits thereto) are included as Exhibit 1-B to the Form A, and that those documents are identical to the copies of the same reviewed by OCI pursuant to our email dated July 24, 2018, with the exception that the "F&L Draft [Date]" information previously found in the headers of those documents has now been removed.

Concurrent with OCI's review of the Form A and Plan of Dissolution, we request that the Commissioner also conduct the examination, if any is deemed necessary, contemplated in Wisconsin Statutes Section 611.74(1) (addressing the "Voluntary dissolution of domestic insurance corporations"), and in conjunction with granting approval of the Form A, include an approval of the dissolution consistent with that statute. We believe that the information filed with the Form A is sufficient to enable the Commissioner to assess the prospect of dissolution, and that, by combining the examination and approval contemplated by Section 611.74 with the Form A review and approval process, the dissolution of TLIC can be completed by filing the Articles of Dissolution with OCI.

Biographical Affidavits and three-year financial projections are being filed in conjunction with this transmission, but separate from the Form A, subject to a request for confidential treatment pursuant to Wisconsin Statutes Section 601.465. TLIC requests confidential treatment for the Biographical Affidavits on the grounds that they contain personal information such as dates of birth and home addresses that, if disclosed to the public, could compromise an individual's personal privacy and lead to identity theft. TLIC requests confidential treatment for the

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three-year financial projections on the grounds that they contain trade secrets, including, but not limited to, plans, procedures, and other information, which are known only to certain individuals working with the applicant, which individuals are using the information to produce services having commercial value that will give the applicant an opportunity to obtain business advantage over competitors.

As evidence of this filing, kindly file-stamp the enclosed copy of this transmittal letter and return the file-stamped copy in the self-addressed, stamped envelope enclosed for your convenience. Of course, please let me know if you have any questions or concerns regarding this application, and thank you for your attention to this matter.

Sincerely,



Kevin G. Fitzgerald

Enclosure