

5. Tentative Agenda for the May 5-6, 1997, meeting in Washington, DC.

**CONTACT PERSON FOR MORE INFORMATION:** Thomas J. Koerber, Secretary of the Board, U.S. Postal Service, 475 L'Enfant Plaza, SW., Washington, DC 20260-1000. Telephone (202) 268-4800.

**Thomas J. Koerber,**  
Secretary.

[FR Doc. 97-7756 Filed 3-21-97; 4:33 pm]

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## SECURITIES AND EXCHANGE COMMISSION

### Submission for OMB Review; Comment Request

Upon Written Request, Copies Available From: Securities and Exchange Commission, Office of Filings and Information Services, Washington, DC 20549

#### Extension:

- Form 11-K, SEC File No. 270-101, OMB Control No. 3235-0082
- Form T-6, SEC File No. 270-344, OMB Control No. 3235-0391

Notice is hereby given that, pursuant to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 *et seq.*), the Securities and Exchange Commission ("Commission") has submitted to the Office of Management and Budget requests for reinstatement of the previously approved collections of information discussed below.

Form 11-K is an annual report of certain types of employee benefit plans. It is filed by an estimated 774 respondents for a total estimated annual burden of 23,220 hours.

Form T-6 is used to apply under Section 310(a)(1) of the TIA for determination of eligibility of a foreign person to act as institutional trustee. It is filed by an estimated 15 respondents for a total estimated annual burden of 255 hours.

General comments regarding the above information should be directed to the following persons: (i) Desk Officer for the Securities and Exchange Commission, Office of Information and Regulatory Affairs, Office of Management and Budget, Room 3208, New Executive Office Building, Washington, D.C. 20503; and (ii) Michael E. Bartell, Associate Executive Director, Office of Information Technology, Securities and Exchange Commission, 450 Fifth Street, N.W., Washington, D.C. 20549. Comments must be submitted to OMB by April 25, 1997.

Dated: March 19, 1997.

**Jonathan G. Katz,**

Secretary.

[FR Doc. 97-7644 Filed 3-25-97; 8:45 am]

BILLING CODE 8010-01-M

[Release No. IC-22575; International Series Release No. 1068; 812-10468]

### Citibank, N.A., et al.; Notice of Application

March 20, 1997.

**AGENCY:** Securities and Exchange Commission ("SEC").

**ACTION:** Notice of application for exemption under the Investment Company Act of 1940 ("1940 Act").

**APPLICANTS:** Citibank, N.A. ("Citibank") and Citicorp.

**RELEVANT 1940 ACT SECTIONS:** Exemption requested under section 6(c) from section 17(f) and rule 17f-5.

**SUMMARY OF APPLICATION:** Applicants seek conditional exemptive relief from section 17(f) of the 1940 Act and rule 17f-5 thereunder. The requested exemption would allow Citibank to make available direct and agency custody arrangements for certain securities and other assets between United States investment companies and Citibank T/O in the Russian Federation.

**FILING DATE:** The application was filed on December 24, 1996. Applicants have agreed to file an additional amendment during the notice period, the substance of which is incorporated herein.

**HEARING OR NOTIFICATION OF HEARING:** An order granting the application will be issued unless the SEC orders a hearing. Interested persons may request a hearing by writing to the SEC's Secretary and serving applicants with a copy of the request, personally or by mail. Hearing requests should be received by the SEC by 5:30 p.m. on April 14, 1997, and should be accompanied by proof of service on applicants, in the form of an affidavit or, for lawyers, a certificate of service. Hearing requests should state the nature of the writer's interest, the reason for the request, and the issues contested. Persons who wish to be notified of a hearing may request notification by writing to the SEC's Secretary.

**ADDRESSES:** Secretary, SEC, 450 5th Street, N.W., Washington, D.C. 20549. Applicants, c/o Wayne J. Rapozo, Esq., Skadden, Arps, Slate, Meagher & Flom LLP, 919 Third Avenue, New York, New York 10022-3897.

**FOR FURTHER INFORMATION CONTACT:** Joseph B. McDonald, Jr., Senior

Counsel, at (202) 942-0533, or Mary Kay Frech, Branch Chief, at (202) 942-0564 (Division of Investment Management, Office of Investment Company Regulation).

**SUPPLEMENTARY INFORMATION:** The following is a summary of the application. The complete application may be obtained for a fee at the SEC's Public Reference Branch.

### Applicants' Representations

#### A. Background

1. Citibank, a United States national banking association, is a wholly-owned subsidiary of Citicorp, a Delaware bank holding company. Citibank operates an extensive custodian network through its branches and through its own subsidiaries and subsidiaries of Citicorp, as well as unaffiliated correspondent banks. As of December 31, 1995, Citibank had approximately \$966 billion in assets under custody.

2. In 1995, Citibank received exemptive relief from the Commission with respect to 15 foreign subsidiaries of Citibank<sup>1</sup> from the provisions of section 17(f) of the 1940 Act to permit, among other things, Citibank as the custodian of securities and other assets (other than cash) (the "MIC Securities") and cash (the "MIC Cash") of any registered management investment company, incorporated or organized under the laws of the United States or a state thereof ("U.S. Investment Company"), or as subcustodian of MIC Securities and MIC Cash for which any other entity is acting as custodian (the "MIC Custodian"), and such U.S. Investment Company or MIC Custodian for which Citibank so acts, to deposit or to cause to permit the deposit of MIC Securities and MIC Cash with such foreign subsidiaries of Citibank ("Agency Custody Arrangements") (the "1995 Order").<sup>2</sup>

3. The 1995 Order also granted exemptive relief permitting such foreign subsidiaries of Citibank to serve as custodian for U.S. Investment Companies, or subcustodian of MIC Securities and MIC Cash for MIC Custodians, pursuant to direct

<sup>1</sup> Citibank (Channel Islands) Limited; Citibank, S.A. in France; Citicorp Investment Bank (The Netherlands) N.V.; Citibank (Zaire) S.A.R.L.; Citibank Zambia Limited; Citicorp Nominees Pty. Limited in Australia; Citibank Nominees (New Zealand) Limited; Citibank Portugal, S.A.; Banco de Honduras S.A.; Citibank Budapest Rt.; Citibank-Maghreb in Morocco; Citibank (Trinidad & Tobago) Limited; Cititrust Columbia S.A. Sociedad Fiduciaria; Citibank (Poland) S.A.; and Citibank a.s. in the Czech Republic (collectively, the "Citibank Subsidiaries").

<sup>2</sup> Investment Company Act Release Nos. 21087 (May 22, 1995) (notice) and 21145 (June 19, 1995) (order).

contractual arrangements between such Citibank subsidiary and a U.S. Investment Company of an MIC Custodian ("Direct Custody Arrangements").

4. The 1995 Order also provides that with the exception of Citibank T/O or any other Citibank subsidiary or affiliate operating in the Russian Federation, (a) the relief granted therein with respect to Agency Custody Arrangements apply to all additional foreign subsidiaries of Citibank which do not meet the shareholders' equity requirements of Rule 17f-5 (collectively, the "Additional Citibank Subsidiaries") and all foreign affiliates of Citibank which are subsidiaries of Citicorp which do not meet the shareholders' equity requirement of Rule 17f-5 (collectively, the "Citibank Affiliates") when such Additional Citibank Subsidiaries and such Citibank Affiliates meet the terms and conditions applicable to the provision of such services set forth in the 1995 Order and (b) the relief granted therein with respect to Direct Custody Arrangements apply to all Additional Citibank Subsidiaries and, at such time as direct custody services are to be offered by them in accordance with applicable law, the Citibank Affiliates, when such Additional Citibank Subsidiaries and such Citibank Affiliates meet the terms and conditions applicable to the provision of services set forth in the 1995 Order.

#### *B. Relief Requested*

1. Applicants seek an order under Section 6(c) of the Act granting exemptive relief from Section 17(f) of the Act to allow Citibank T/O in the Russian Federation to provide foreign custody services in connection with the holding of MIC Securities and MIC Cash of any U.S. Investment Company pursuant to (1) Agency Custody Arrangements and (2) Direct Custody Arrangements.<sup>3</sup>

2. The Citibank Subsidiaries, the Additional Citibank Subsidiaries and the Citibank Affiliates, from time to time providing custodial services pursuant to the terms of the 1995 Order, and

Citibank T/O, at such time as it provides custodial services pursuant to the requested order, will hereinafter collectively be referred to as the "Exemptive Order Network Members".

3. Under the Agency Custody Arrangements, MIC Securities and MIC Cash are maintained in the custody of an Exemptive Order Network Member in accordance with a custody agreement among (a) the U.S. Investment Company or MIC Custodian for which Citibank acts as custodian or subcustodian, (b) Citibank, and (c) Citicorp (the "Agency Custody Agreement"). Citibank acts as the custodian or subcustodian of the MIC Securities and MIC Cash and is authorized to delegate its responsibilities to the Exemptive Order Network Member in accordance with the terms of a subcustodian agreement (the "Subcustodian Agreement").

4. The Agency Custody Agreement provides that the delegation by Citibank to an Exemptive Order Network Member does not relieve Citibank of any responsibility to the U.S. Investment Company or MIC Custodian for any loss due to the negligent acts or omissions of the Exemptive Order Network Member except such loss as may result from political risk (e.g., exchange control restrictions, confiscation, expropriation, nationalization, insurrection, civil strife or armed hostilities), and other risk of loss for which neither Citibank nor the Exemptive Order Network Member would be liable under rule 17f-5 (e.g., despite the exercise of reasonable care, loss due to Act of God, nuclear incident and the like). The Agency Custody Agreement also provides that Citicorp is liable, in accordance with the terms of the guarantee described below, for losses of MIC Securities and/or MIC Cash resulting from the bankruptcy or insolvency of the Exemptive Order Network Member.

5. The Direct Custody Arrangements will enable the Exemptive Order Network Members to act as direct custodians in accordance with either a master custody agreement under which a U.S. Investment Company or MIC Custodian enters into a direct custodial relationship with a number of Exemptive Order Network Members or an individual custody agreement under which a U.S. Investment Company or MIC Custodian enters into a direct custodial relationship with a particular Exemptive Order Network Member (either, a "Direct Custody Agreement"). The Direct Custody Agreement would be among (i) The U.S. Investment Company or MIC Custodian for which the Exemptive Order Network Member acts as custodian or subcustodian, (ii) the Exemptive Order Network Member,

(iii) Citicorp, and (iv) Citibank. The terms of each Direct Custody Agreement would include a confirmation by the Exemptive Order Network Member that it will act as the custodian or subcustodian, as the case may be, of the MIC Securities and MIC Cash under the requested order, an agreement by Citicorp that it is liable, in accordance with the terms of its guarantee, for losses of MIC Securities and MIC Cash resulting from the bankruptcy or insolvency of the Exemptive Order Network Member, and an agreement by Citibank to be liable for any loss resulting from the performance of the Exemptive Order Network Member, except such loss as may result from political risk (e.g., exchange control restrictions, confiscation, expropriation, nationalization, insurrection, civil strife or armed hostilities), and other risk of loss for which neither Citibank nor the Exemptive Order Network Member would be liable under rule 17f-5 (e.g., despite the exercise of reasonable care, loss due to Act of God, nuclear incident and the like).

6. The extent of Citibank's liability for losses attributable to Citibank T/O under the Direct Custody Arrangements would be the same as that provided for under the Agency Custody Arrangements. Under both the Agency Custody Arrangements and the Direct Custody Arrangements, Citibank would be liable for the negligent acts or omissions of Citibank T/O.

7. Both the Agency and Direct Custody Agreements would provide that Citicorp will be liable in accordance with the terms of a guarantee for losses of MIC Securities and MIC Cash resulting from bankruptcy or insolvency of Citibank T/O. Under the 1995 Order, Citicorp has issued a guarantee for losses of MIC Securities and MIC Cash held by the Exemptive Order Network Member under the Agency and Direct Custody Agreements resulting from the bankruptcy or insolvency of each Exemptive Order Network Member (the "Guarantee"). If the requested order is issued and Citibank T/O becomes an Exemptive Order Network Member, the Guarantee will be amended to cover all MIC Securities and MIC Cash held by Citibank T/O. The dollar amount of the Guarantee applicable to all Exemptive Order Network Members will equal or exceed the aggregate market value of MIC Securities and MIC Cash held in the custody of the Exemptive Order Network Members.

8. The value of MIC Securities and amount of MIC Cash held under Agency Custody Agreements will be calculated by Citibank based on records maintained by Citibank, as custodian,

<sup>3</sup> Clearing and custody procedures in the Russian Federation differ substantially from the procedures generally employed in other jurisdictions. Other than the exemption requested from section 17(f) and rule 17f-5 so that the Direct Custody Arrangements and Agency Custody Arrangements may apply to Citibank T/O in the Russian Federation, applicants are not requesting an exemption from section 17(f) or rule 17f-5 for any aspect of the custody or clearing procedures employed in the Russian Federation. Furthermore, applicants acknowledge that any order granting the application may not be deemed a determination by the SEC that the Russian clearing and custody procedures comply with section 17(f) or any rule thereunder.

and reports by the Exemptive Order Network Members. The total amount also will be reported to Citicorp. In addition, each Exemptive Order Network Member will submit to Citibank, as agent for Citicorp, the Exemptive Order Network Member's calculation, and the basis on which it was made, of the value of MIC Securities and amount of MIC Cash held by it under Direct Custody Agreements. After review of the results of the monthly monitoring, Citicorp will take the necessary steps to adjust the amount of the Guarantee to cover the aggregate value of the MIC Securities and the aggregate amount of MIC Cash.

9. In the event that at the time of a bankruptcy or insolvency an Exemptive Order Network Member holds MIC Securities and MIC Cash having an aggregate value in excess of the aggregate value of MIC Securities and MIC Cash which such Exemptive Order Network Member held at the time of the previous adjustment of the Guarantee, Citicorp will immediately take such steps as may be necessary to increase the size of the Guarantee to cover the amount of such excess. This coverage will remain in place until such time as the Exemptive Order Network Member's bankruptcy estate is settled, the amount of any loss to the U.S. Investment Company or MIC Custodian attributable to the bankruptcy or insolvency is calculated, and payment under the Guarantee, if necessary, is made.

#### **Applicants' Legal Analysis**

1. Applicants seek the requested exemptive relief because Citibank T/O does not qualify to serve as custodian for MIC Securities and MIC Cash under the terms of section 17(f) of the 1940 Act or rule 17f-5 thereunder. Section 17(f) provides, in relevant part, that a registered management investment company may place and maintain its securities and similar assets in the custody of a bank or banks meeting the requirements of section 26(a) of the 1940 Act. Citibank T/O, however, does not fall within the definition of a "bank" as that term is defined in section 2(a)(5) of the 1940 Act.

2. Rule 17f-5 would permit a U.S. Investment Company to deposit securities, cash and cash equivalents with an "eligible foreign custodian," a term that is defined to include, as here relevant, a majority-owned direct or indirect subsidiary of a qualified U.S. bank or bank holding company that is incorporated or organized under the laws of a country other than the United States and that has shareholders' equity in excess of \$100,000,000 (U.S.\$ or equivalent). The rule defines the term

"Qualified U.S. Bank" to include a banking institution organized under the laws of the United States that has an aggregate capital, surplus, and undivided profit of not less than \$500,000. Citibank is a Qualified U.S. Bank as defined in the rule. Citibank T/O, however, currently does not meet the minimum shareholders' equity requirement of rule 17f-5.

3. Although Citibank will not be in an agency relationship with Citibank T/O under the Direct Custody Arrangements, it nonetheless will provide the necessary review and independent oversight of the performance and capabilities of Citibank T/O. Applicants submit that Citibank's review will insure that adequate safeguards are in place and that service standards for custodial administration and operations are in place. Because Citibank will agree to be responsible for negligent acts or omissions of Citibank T/O under the Agency Custody Arrangements and the Direct Custody Arrangements, Citibank will have a vested interest in verifying that Citibank T/O maintains adequate standards.

4. Under the Direct Custody Arrangements, Citibank will be in privity of contract with the U.S. Investment Company or MIC Custodian. While it would be necessary for a U.S. Investment Company or MIC Custodian to establish the negligence of Citibank T/O in the action against Citibank, the U.S. Investment Company or MIC Custodian would be entitled to seek recovery from Citibank in the first instance.

5. Pursuant to the Agency Custody Agreement, Citibank acts as the custodian or subcustodian of MIC Securities and MIC Cash and is authorized to delegate its responsibilities to the Exemptive Order Network Member in accordance with the terms of the Subcustodian Agreement. The Subcustodian Agreement explicitly provides that U.S. Investment Companies or MIC Custodians, as the case may be, that have entered into an Agency Custody Agreement with Citibank are third party beneficiaries of the Subcustodian Agreement, are entitled to enforce the terms of the Subcustodian Agreement, and are entitled to seek relief directly against the Exemptive Order Network Member or against Citibank.

6. Applicants believe that provision of the Guarantee by Citicorp (rather than by Citibank) under the Agency and Direct Custody Arrangements does not negatively affect the level of protection afforded the U.S. Investment Companies and MIC Custodians. Since the Guarantee will be at least equal to the

aggregate value of all MIC Securities and MIC Cash held by all Exemptive Order Network Members at the end of the previous calendar month and the total Guarantee amount is available to cover one or more Exemptive Order Network Members, the Guarantee should be more than sufficient to cover losses attributable to the bankruptcy or insolvency of any one particular Exemptive Order Network Member.

#### **Applicants' Conditions**

If the requested order is granted, applicants agree to the following conditions:

1. The foreign custody arrangements proposed with respect to Citibank T/O will satisfy the requirements of rule 17f-5 in all respects other than with regard to shareholders' equity.

2. MIC Securities and MIC Cash custodied pursuant to Agency Custody Arrangements will be maintained with Citibank T/O only in accordance with an Agency Custody Agreement, required to remain in effect at all times during which Citibank T/O fails to satisfy the requirements of rule 17f-5 relating to shareholders' equity.

3. The Agency Custody Agreement will be among (i) the U.S. Investment Companies or MIC Custodians for which Citibank serves as custodians or subcustodian, (ii) Citibank, and (iii) Citicorp. The Agency Custody Agreement will provide the following:

(a) Citibank will act as the custodian or subcustodian, as the case may be, of the MIC Securities and MIC Cash and will be able to delegate its responsibilities to Citibank T/O;

(b) Citibank's delegation of duties to Citibank T/O will not relieve Citibank of any responsibility to the U.S. Investment Company or MIC Custodian for any loss due to the negligent performance by Citibank T/O, except such loss as may result from (i) political risk (e.g., exchange control restrictions, confiscation, expropriation, nationalization, insurrection, civil strife or armed hostilities) and (ii) other risks of loss for which neither Citibank nor Citibank T/O would be liable under rule 17f-5; and

(c) Citicorp will be liable, in accordance with the terms of the Guarantee, for losses of MIC Securities and/or MIC Cash resulting from the bankruptcy or insolvency of Citibank T/O.

4. With respect to the Agency Custody Arrangements, Citibank will enter into a Subcustodian Agreement with Citibank T/O pursuant to which Citibank will delegate to Citibank T/O such of its duties and obligations as would be necessary to permit Citibank T/O to hold in custody, in the Russian Federation, MIC Securities and MIC Cash. The Subcustodian Agreement will provide an acknowledgement by Citibank T/O that it is acting as a foreign

custodian for U.S. Investment Companies and MIC Custodians pursuant to the terms of the exemptive order requested by the application. The Subcustodian Agreement will explicitly provide that U.S. Investment Companies or MIC Custodians that have entered into an Agency Custody Agreement with Citibank will be third party, beneficiaries of the Subcustodian Agreement, will be entitled to enforce the terms thereof, and will be entitled to seek relief directly against Citibank T/O or against Citibank.

5. The Subcustodian Agreement between Citibank and Citibank T/O will be governed by New York law; or, if it were governed by the local law of the Russian Federation, Citibank shall obtain an opinion of counsel from Russian counsel opining as to the enforceability of the rights of a third party beneficiary under the laws of such foreign jurisdiction.

6. MIC Securities and MIC Cash of U.S. Investment Companies and MIC Custodians entering into Direct Custody Arrangements with Citibank T/O will be maintained with Citibank T/O only in accordance with a Direct Custody Agreement, required to remain in effect at all times during which Citibank T/O fails to satisfy the requirements of rule 17f-5 relating to shareholders' equity.

7. The Direct Custody Agreement will be among (i) each U.S. Investment Company or MIC Custodian for which Citibank T/O serves as custodian or subcustodian, (ii) Citibank T/O, (iii) Citibank, and (iv) Citicorp. The Direct Custody Agreement will provide the following:

(a) confirmation by Citibank T/O that it will act as the custodian or subcustodian, as the case may be, of the MIC Securities and MIC Cash pursuant to the requested order;

(b) Citicorp will be liable, in accordance with the terms of the Guarantee, for losses of MIC Securities and/or MIC Cash resulting from the bankruptcy or insolvency of Citibank T/O; and

(c) Citibank will be liable for any loss resulting from the performance of Citibank T/O, except such loss as may result from (i) political risk (e.g., exchange control restrictions, confiscation, expropriation, nationalization, insurrection, civil strife, or armed hostilities) and (ii) other risks of loss for which Citibank T/O would not be liable under rule 17f-5.

8. Under the Direct Custody Arrangements, U.S. Investment Companies or MIC Custodians, as the case may be, will be entitled to seek relief directly against Citibank or Citibank T/O.

9. The dollar value of the Guarantee applicable to the Exemptive Order Network Members shall be at least equal to the aggregate value of the MIC

Securities and MIC Cash held in the custody of such Exemptive Order Network Members pursuant to the Direct Custody Agreements and the Agency Custody Agreements, calculated at the close of the previous calendar month. The value of MIC Securities and MIC Cash held in the custody of the Exemptive Order Network Members, as Citibank's subcustodians, will be calculated by Citibank based on records maintained by Citibank and reports by such Exemptive Order Network Members as at the end of each calendar month, and such amount will be reported to Citicorp. In addition, each Exemptive Order Network Member will submit to Citibank, as agent for Citicorp, monthly its calculation, and the basis on which it was made, of the market value of MIC Securities and MIC Cash held in custody by it under Direct Custody Agreements. After reviewing the results of the monthly monitoring, Citicorp will take such steps as may be necessary to adjust the amount of the Guarantee to cover the aggregate value of the MIC Securities and MIC Cash held by Exemptive Order Network Members, under Agency and Direct Custody Agreements. In the event of the insolvency of an Exemptive Order Network Member at a time when the aggregate value of MIC Securities and MIC Cash held by such Exemptive Order Network Member is in excess of the amount of MIC Securities and MIC Cash which such Exemptive Order Network Member held at the prior calendar month's end, Citicorp will immediately take such steps (if any) as may be necessary to increase the size of the Guarantee to cover the amount of such excess.

10. Citibank currently satisfies and will continue to satisfy the Qualified U.S. Bank requirement set forth in rule 17f-5(c)(3).

For the Commission, by the Division of Investment Management, under delegated authority.

**Jonathan G. Katz,**  
Secretary.

[FR Doc. 97-7647 Filed 3-25-97; 8:45 am]  
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[Release No. IC-22576; File No. 812-10462]

**Cova Financial Services Life Insurance Company, et al.**

March 20, 1997.

**AGENCY:** Securities and Exchange Commission ("SEC" or "Commission").

**ACTION:** Notice of application for exemption under the Investment Company Act of 1940 (the "1940 Act").

**APPLICANTS:** Cova Financial Services Life Insurance Company ("Cova Life") and Cova Variable Annuity Account One ("Variable Account One")

**RELEVANT 1940 ACT SECTIONS:** Order requested pursuant to Section 26(b) approving the proposed substitution of securities.

**SUMMARY OF APPLICATION:** Applicants seek an order approving the proposed substitution of shares of the International Equity Portfolio of Cova Series Trust ("Cova Trust") for shares of the Global Equity Portfolio of Lord Abbett Series Fund, Inc. ("Lord Abbett Fund") which currently are held by Variable Account One to fund certain single purchase payment and flexible purchase payment variable annuity contracts ("Contracts") issued by Cova Life.

**FILING DATE:** The application was filed on December 13, 1996, and amended and restated on March 18, 1997.

**HEARING OR NOTIFICATION OF HEARING:** An order granting the application will be issued unless the Commission orders a hearing. Interested Persons may request a hearing by writing to the Secretary of the Commission and serving Applicants with a copy of the request, personally or by mail. Hearing requests should be received by the Commission by 5:30 p.m., on April 14, 1997, and should be accompanied by proof of service on Applicants in the form of an affidavit or, for lawyers, a certificate of service. Hearing requests should state the nature of the requester's interest, the reason for the request, and the issue contested. Persons may request notification of a hearing by writing to the Secretary of the SEC.

**ADDRESSES:** SEC, Secretary, 450 Fifth Street, NW., Washington, D.C. 20549. Applicants, c/o Raymond A. O'Hara III, Blazzard, Grodd & Hasenauer, P.C., P.O. Box 5108, Westport, Connecticut, 06881. Copies to Jeffery K. Hoelzel, Esq., Senior Vice President, General Counsel and Secretary, Cova Financial Services Life Insurance Company, One Tower Lane, Suite 3000, Oakbrook Terrace, IL 60181-4644.

**FOR FURTHER INFORMATION CONTACT:** Megan L. Dunphy, Staff Attorney, or Patrice M. Pitts, Branch Chief, Office of Insurance Products, Division of Investment Management, at (202) 942-0670.

**SUPPLEMENTARY INFORMATION:** Following is a summary of the application. The complete application may be obtained for a fee from the Public Reference Branch of the SEC.