

Date: August 15, 2011

To: All Annuity Producers

From: Chad Eslinger, Chief Compliance Officer, ReliaStar Life Insurance Company and ReliaStar Life Insurance Company of New York
Ida Colón-Perez, Chief Compliance Officer, ING Life Insurance and Annuity Company
Kristi Cooper, Chief Compliance Officer, ING USA Annuity and Life Insurance Company

Suitability & Company Provided Product-Specific Training Requirement

As you are aware, annuities have been the subject of increased regulatory activity within recent years. In March 2010, the National Association of Insurance Commissioners (NAIC) published the 2010 Suitability in Annuity Transactions Model Regulation ("Suitability Model Regulation"). A number of states have already adopted the Suitability Model Regulation and almost all states are expected to adopt the regulation within the next year. The regulation has many specific requirements, but the main goals of the Suitability Model Regulation are to ensure that annuity transactions are suitable and to ensure that producers selling annuity products have adequate knowledge of annuities and the specific products they recommend. The Suitability Model Regulation contains requirements relating to both annuity product specific training as well as annuity education.

While we believe our producers understand annuities, as well as the specific ING annuity products they recommend, ING is rolling out a nationwide training and continuing education program consistent with the requirements of the Suitability Model Regulation. Implementing such a program is important not only for clients, but also for our financial professionals and the annuity industry in general. As a leader in the industry, we are committed to providing our financial professionals with the products, information and resources to help their clients meet their financial goals. We believe this training will be beneficial both in substance as well as to further assure the public and regulators that we are committed to suitability and training.

It is our understanding that the National Association of Fixed Annuities (NAFA), the fixed annuity trade organization, is working with annuity product carriers throughout the industry to rollout the new training and suitability requirements.

Effective September 15, 2011, ReliaStar Life Insurance Company, ING Life Insurance and Annuity Company and ING USA Annuity and Life Insurance Company ("the Company") will implement the following requirements based on the provisions of the 2010 NAIC Suitability in Annuity Transactions Model Regulation, regarding the sale of individually-solicited annuity products. These requirements will be implemented for **all** states that have not previously adopted the Suitability Model Regulation. If a given state adopts producer training and/or suitability requirements that deviate from the standards presented in this communication, the Company will communicate those requirements on a state by state basis.

IMPORTANT NOTES

- 1. Company annuity products solicited without first completing the annuity training requirements listed below will be returned for re-solicitation.**
- 2. IMPORTANT - Prior to the sale, solicitation or negotiation of Company annuity contracts, all Insurance Producers selling or soliciting Individual Annuity Products must:**
 - As of September 15, 2011, complete Company provided product-specific training.
 - As of March 1, 2012, complete a one-time four (4) credit hour annuity training course by an approved vendor offering an annuity products course and ensure the Company receives confirmation of completion.

Training link and State Training Grid

- **Product specific training link:**
 - Click [here](#) for Annuity product training offered through Kaplan.
- **State Training Grid**
 - Please click [here](#) for the NAIC Suitability Model Regulation state-by-state training dates guide.

Solicitation Requirements

During the solicitation process, all Insurance Producers selling or soliciting Individual Annuity Products must:

1. Use the applicable Suitability Profile form, when soliciting non-registered annuities; and
2. Make a record of any recommendation; and
3. Maintain or be able to make available to the commissioner records of the information collected from the consumer and other information used in making the recommendations that were the basis for the annuity transactions for **ten years** after the transaction is completed by the Company.

Sales made under the supervision of a registered broker dealer in compliance with FINRA requirements pertaining to suitability and supervision of annuity transactions shall also satisfy these requirements, provided that the broker dealer has certified to the Company that they are performing Suitability analysis for the Companies non-registered annuities.

Please note that the suitability regulation also provides that Insurance Producers shall not dissuade, or attempt to dissuade, a consumer from:

1. Truthfully responding to an insurer's request for confirmation of suitability information;
2. Filing a complaint; or
3. Cooperating with the investigation of a complaint.

Please review the ING Business Guidelines, which can be obtained at the ING for Professionals website: <http://www.ingforprofessionals.com>, or upon request to the Company by calling the number listed below.

If you have questions regarding the Company's administration of these suitability requirements, please call your primary distribution channel listed below:

ReliaStar Annuity (Independent TSA)	866-464-8727
ING Annuity and Asset Sales (Fixed and Variable)	800-369-5301
Strategic Distribution (NAC Contract)	800-369-5301

Insurance products, annuities and funding agreements issued by **ING Life Insurance and Annuity Company** ("ILIAC") OneOrange Way, Windsor, CT 06095, which is solely responsible for meeting its obligations. Plan administrative services provided by ILIAC or **ING Institutional Plan Services, LLC**. **Securities distributed by or offered through ING Financial Advisers, LLC (member SIPC) or other broker-dealers with which it has a selling agreement.** Annuities may also be issued by **ReliaStar Life Insurance Company** (Minneapolis, MN), **ING USA Annuity and Life Insurance Company** (Des Moines, IA) and **ReliaStar Life Insurance Company of New York** (Woodbury, NY). Variable annuities issued by ReliaStar Life Insurance Company are distributed by ING Financial Advisers, LLC. Variable annuities issued by ING USA Annuity and Life Insurance Company and ReliaStar Life Insurance Company of New York are distributed by Directed Services LLC. Within the state of New York, only ING Life Insurance and Annuity Company and ReliaStar Life Insurance Company of New York are admitted and issue products. All companies are members of the ING family of companies.