

February 21, 2013

Geeta Napoli
First Investors Corporation
110 Wall Street 4th Floor
New York City NY 10005

Reference: **FR2013-0206-0339/H**

Org Id :305

REVIEW LETTER

1. Seminar - Estate Planning Insurance Considerations (#12-0820)
Rules: FIN 2210, SEC 482, VARIABLE
21 pages

Fee: \$235

Total Fee: \$235

Attention: Geeta Napoli

Revisions are necessary for the above-referenced seminar to be consistent with applicable standards. We offer the following specific comments:

We note the inclusion of the prospectus offer. However, in order to be consistent with the presentation standards set forth in SEC Rule 482(b)(5), the prospectus offer must be presented in a type size at least as large as and of a style different from, but at least as prominent as, that used in the major portion of the material.

In order to provide a sound basis to evaluate the information included on the "Estate Growth Implications" pages, a more complete narrative explanation is necessary to ensure the reader understands the implications of each column and the terminology used. We offer this comment pursuant to Rule 2210(d)(1)(A).

If you have any questions regarding these comments, please contact me at 240.386.4500.

Reviewed by,

Nancy M. Damiano
Supervising Analyst

jws

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