

Contracts/File Nos.	Total	Divisions		Transfers	
		Principal fund	Putnam trust	Minimum amount	Fee
VA Contracts:					
Flexible Variable Annuity (File No. 33-74232)	42	27	0	100	² 30
Freedom Variable Annuity (File No. 333-63401)	17	15	0	50	None
Premier Variable Annuity (File No. 33-44670)	25	25	0	(³)	None

¹ Imposed on each transfer exceeding four per policy year.

² Imposed on each transfer exceeding twelve per policy year.

³ No minimum.

6. The only Divisions affected by the application are those identified in the following table. Each of those Divisions invests solely in the Principal Fund Account or the Putnam Trust Fund as indicated in this table.

Division of each of VL separate account and separate account B	Principal fund
LargeCap Growth	LargeCap Growth Account
LargeCap Growth Equity	LargeCap Growth Equity Account
Blue Chip ⁴	Blue Chip Account
LargeCap Stock Index	LargeCap Stock Index Account
MidCap Growth Equity	MidCap Growth Equity Account
MidCap Growth	MidCap Growth Account
Asset Allocation	Asset Allocation Account
Equity Growth	Equity Growth Account
	Putnam Trust
Putnam VT Global Asset Allocation	Putnam VT Global Asset Allocation Fund
Putnam VT Vista	Putnam VT Vista Fund

⁴ Separate Account B has a Blue Chip Division; VL Separate Account does not have a Blue Chip Division.

The Principal Fund Accounts and the Putnam Trust Funds indicated in the table above are referred to herein collectively as the "Principal Funds" and the "Putnam Funds," respectively. Principal Funds and Putnam Funds are

referred to herein collectively as the "Funds."

7. Principal Funds are managed by Principal Management Corporation ("PMC"), a registered investment adviser under the Investment Advisers Act of 1940, as amended ("Advisers

Act") and an indirect, wholly-owned subsidiary of Principal Financial Group, Inc. The following table identifies the sub-adviser for each of the Principal Funds and indicates its affiliation, if any, with Principal Financial Group, Inc.

Fund	Sub-adviser
LargeCap Growth Account	Janus Capital Management LLC ("Janus"), a registered investment adviser under the Advisers Act (File No. 801-13991).
LargeCap Growth Equity Account	Putnam Investment Management LLC ("Putnam"), a registered investment adviser under the Advisers Act (File No. 801-7974).
Blue Chip Account	Principal Global Investors, LLC ("PGI"), an indirect, wholly-owned subsidiary of Principal Life and a registered investment adviser under the Advisers Act (File No. 801-55959).
LargeCap Stock Index Account	PGI.
MidCap Growth Equity Account	Turner Investment Partners, Inc. ("Turner"), a registered investment adviser under the Advisers Act (File No. 801-36220).
MidCap Growth Account	The Dreyfus Service Corporation ("Dreyfus"), a registered investment adviser under the Advisers Act (File No. 801-54739).
Asset Allocation Account	Morgan Stanley Investment Management, Inc. ("Morgan Stanley"), a registered investment adviser under the Advisers Act (File No. 801-15757).
Equity Growth Account	Morgan Stanley.

8. Putnam Funds are managed by Putnam.

9. Applicants seek an order permitting each the following substitutions ("Substitutions"):

Substitution	Replaced fund/sub-adviser	Substituted fund/sub-adviser
One	LargeCap Growth Account (Janus)	LargeCap Growth Equity Account (Putnam).
Two	Blue Chip Account (PGI)	LargeCap Stock Index Account (PGI).
Three	MidCap Growth Equity Account (Turner)	MidCap Growth Account (Dreyfus).
Four	Putnam VT Global Asset Allocation Fund Account (Putnam).	Asset Allocation (Morgan Stanley).