

SECURITIES AND EXCHANGE COMMISSION

FORM 497J

Certification of no change in definitive materials under paragraph (j) of Securities Act Rule 497

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FILER

IDS LIFE OF NEW YORK VARIABLE ANNUITY ACCOUNT

CIK: **1007571** | IRS No.: **000000000** | State of Incorporation: **NY** | Fiscal Year End: **1231**
Type: **497J** | Act: **33** | File No.: **333-91691** | Film No.: **05788714**

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May 2, 2005

Securities and Exchange Commission
450 Fifth Street, N.W.
Washington, D.C. 20549-1004

ATTN: Document Control - EDGAR

Re: IDS Life of New York Variable Annuity Account
American Express Retirement Advisor Variable Annuity(R)
American Express Retirement Advisor Advantage(R) Variable Annuity
American Express Retirement Advisor Select Variable Annuity(R)
American Express Retirement Advisor Advantage Plus(R) Variable Annuity
American Express Retirement Advisor Select Plus(R) Variable Annuity
File No. 333-91691/811-07623

Dear Commissioners:

Registrant certifies that the forms of prospectuses and Statement of Additional Information that would have been filed under paragraph (c) of Rule 497 would not have differed from that contained in the most recent Registration Statement or Amendment, and the text of the most recent Registration Statement or Amendment has been filed electronically.

Sincerely,

/s/ Mary Ellyn Minenko

Mary Ellyn Minenko
Group Counsel