

SECURITIES AND EXCHANGE COMMISSION

FORM 497J

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

Filing Date: **2005-05-02**
SEC Accession No. **0000820027-05-000444**

(HTML Version on secdatabase.com)

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AXP VARIABLE PORTFOLIO INVESTMENT SERIES INC

CIK: **353968** | IRS No.: **411409539** | State of Incorporation: **MN** | Fiscal Year End: **0831**
Type: **497J** | Act: **33** | File No.: **002-73115** | Film No.: **05789696**

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May 2, 2005

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

ATTN: Mark Cowan
Document Control - EDGAR

Re: AXP Variable Portfolio - Investment Series, Inc.
AXP Variable Portfolio - Mid Cap Value Fund
Post-Effective Amendment No. 54
File No. 2-73115/811-3218

Dear Mr. Cowan:

Pursuant to Rule 497(j) under the Securities Act of 1933, as amended, please accept this letter as certification that the prospectus and statement of additional information for the above referenced fund does not differ from that contained in the Registrant's Post-Effective Amendment No. 54 (Amendment). This Amendment was filed electronically on April 25, 2005.

If you have any questions regarding this filing, please contact either me at 612-671-4321 or Boba Selimovic at 612-671-7449.

Sincerely,

/s/ Christopher O. Petersen

Christopher O. Petersen
Counsel
American Express Financial Corporation