

SECURITIES AND EXCHANGE COMMISSION

FORM CORRESP

Correspondence

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April 30, 2012

Alison White, Esq.
Office of Insurance Products
Division of Investment Management
U.S. Securities and Exchange Commission
100 F Street NE
Washington, DC 20549-0506

Re: Transamerica Life Insurance Company (“Transamerica”) and its Separate Account VA B Post-Effective Amendment No. 41 to Form N-4 Registration Statement (File No. 33-56908); Separate Account VA Y Post-Effective Amendment No. 20 to Form N-4 Registration Statement (File No. 333-131987); and Separate Account VA EE Post-Effective Amendment No. 11 to Form N-4 Registration Statement (File No. 333-149336)

This letter responds to verbal comments that you provided on April 3, 2012, with respect to the above-referenced Post-Effective Filings for Separate Accounts VA B, VA Y and VA EE of Transamerica Life Insurance Company (“TLIC” or “we”). For your convenience, I have restated those comments below, and followed each comment with our response.

1. GENERAL

- a. Please include a numeric example in the supplement showing how the enhancement will be calculated.

Response: The disclosure has been revised as requested. Please see page 31.

- b. Please bold the statement: “You are not required to accept ALSO or take any action. If you do not accept ALSO, your Existing Policy and Eligible Rider will continue in full force and effect under the terms of the Existing Policy and Eligible Rider.”

Response: The disclosure has been revised as requested. Please see page 1.

- c. For convenience please summarize eligible riders in the supplement or appendix thereto.

Response: The disclosure has been revised as requested. Please see page 4.

2. CONSIDERATIONS REGARDING ACCEPTING ALSO

- a. Please revise the first bullet for clarity (that is, it is not necessarily accurate to state that the base contract has no surrender charge). Also, please make it clear that if you intend to exchange an Existing Policy for Principium II or Axiom contracts, you are required to purchase the Access Rider for which there is an additional fee.

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Response: The disclosure has been revised as requested. Please see page 2.

- b. Please make it clear that your financial representative may have a financial incentive to recommend trading in your policy.

Response: The disclosure has been revised as requested. Please see page 2.

- c. Please make the disclosure regarding the tax implications for surrendering your contract, including the 10% penalty, more prominent.

Response: The disclosure has been revised as requested. Please see page 2.

3. HOW TO ACCEPT ALSO

- a. For clarity, please revise the sentence before bolded with: Partial surrenders, partial exchanges and partial trade ins are not permitted under ALSO.

Response: The disclosure has been revised as requested. Please see page 3.

- b. Please disclose what notice, if any, will be provided before ALSO can be terminated.

Response: Depending on the circumstances, the Company may communicate the termination of the offer via a variety of methods that may include, without limitation, notifying selling firms, providing information via the Company's website or customer service call center, and/or mailing a notice to contract owners.

4. COMPARISON OF THE EXISTING POLICY AND THE NEW POLICY

- a. Please review the tables for accuracy.

Response: The disclosure has been reviewed.

- b. For clarity, please add a row to each chart listing the eligible riders under each policy.

Response: The disclosure has been revised as requested. Please see pages 5–29.

- c. As Principium II and Axiom have identical information in the table other than the Access rider, yet Principium II is less expensive. Please explain supplementally why anyone would select the Axiom policies.

Response: Pursuant to the offer, both Principium II and Axiom policies must be elected with the Access Rider (the Access Rider is a "c-share rider" which provides for no deferred sales load). The separate account charges for the policy with c-share rider for both Principium II and Axiom are the same (1.20%). In addition, the Principium II and Axiom policies may be available through different distribution channels.

- d. Please confirm supplementally that all material aspects of the New Policy that are less favorable than the old contract are disclosed. For example, some riders offered under the New and Existing Policies have gotten more expensive and the age withdrawal bands have gotten less favorable.

Response: The comparison charts in the prospectus supplement summarize key features of the New and Existing Policies, and refers owners to the prospectuses that describe all material features of the respective policies. In response to the staff's comments the Company has added additional comparative information (including fees) regarding the living benefit riders available to contract owners who elect an exchange under ALSO. Please note that with respect to the age bands, an owner with an Eligible Rider would not be able to purchase a living benefit rider under a New Policy in connection with ALSO.

- e. It appears that many of the Existing Policy prospectuses do not include information about discontinued riders and old charges (see for example WRL Freedom Conqueror, File #333-49558). Please note that the prospectus must fully describe these features (the fees must be in the fee table but the rider disclosure may be moved to an appendix in the prospectus).

Response: The information has been added to the Existing Policy prospectuses.

5. TANDY REPRESENTATION

- a. Please include the Tandy representation in your response to these comments.

Response: Transamerica Life Insurance Company acknowledges the following:

should the Commission or the staff, acting pursuant to delegated authority, declare the filing effective, it does not foreclose the Commission from taking any action with respect to the filing;

the action of the Commission or the staff, acting pursuant to delegated authority, declare the filing effective, it does not foreclose the Commission from taking any action with respect to the filing;

the registrant may not assert this action as defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

As we discussed today, the Company will offer trade-ins only into the Transamerica FreedomSM Variable Annuity. If you have any further questions, please contact the undersigned at 319-355-8330. Thank you very much for your assistance with these filings.

Very truly yours,

/s/ Darin D. Smith
Darin D. Smith
General Counsel

TRANSAMERICA FREEDOMSM VARIABLE ANNUITY

Issued by

TRANSAMERICA LIFE INSURANCE COMPANY

Supplement dated May 1, 2012

to the

Prospectus dated May 1, 2012

**ALTERNATIVE LUMP SUM OFFER
For Eligible Owners Who Have The
FAMILY INCOME PROTECTOR, MANAGED ANNUITY PROGRAM,
MANAGED ANNUITY PROGRAM II or
GUARANTEED MINIMUM INCOME BENEFIT RIDERS**

For a limited time beginning on or about May 21, 2012, the Company is making a one-time Alternative Lump Sum Offer (the "ALSO") to Eligible Owners (defined below) of the Transamerica variable annuity policies listed below (each, an "Existing Policy") and an in force Family Income Protector, Managed Annuity Program, Managed Annuity Program II or Guaranteed Minimum Income Benefit rider (each, an "Eligible Rider"). In simple terms, ALSO is an offer to buy you out of your Existing Policy in return for your full cash surrender value plus an "Enhancement Amount" (defined below). If you accept the offer, then you would give up your Existing Policy, including the guaranteed lifetime income provided by the Eligible Rider, in return for the enhancement of your cash surrender value. To accept ALSO, you must either:

surrender your Existing Policy (a "Surrender"),

trade in your Existing Policy for the Transamerica FreedomSM Variable Annuity (a "New Policy") offered by the Company (a "Trade In"), or

exchange your Existing Policy for an annuity product (a "Replacement Policy") issued by an unaffiliated company (an "Exchange").

Please Note: You are not required to accept ALSO or take any action. If you do not accept ALSO, your Existing Policy and Eligible Rider will continue in full force and effect under the terms of the Existing Policy and Eligible Rider.

The Alternative Lump Sum Offer

If you are an Eligible Owner, and all conditions of ALSO are satisfied, we will add to your cash surrender value under the Existing Policy an amount (the "Enhancement Amount") equal to 0.80% of your minimum annuitization value or minimum income base (hereinafter both referred to as "annuitization base") under your Eligible Rider minus the cash surrender value. The Enhancement Amount will be calculated using your cash surrender value and annuitization base next computed after we receive your acceptance of ALSO and any other information we need to process your Surrender, Trade In, or Exchange, in our Administrative and Service Office (the "Transaction Date"). We will add the Enhancement Amount to your cash surrender value immediately before we process your Surrender, Trade In, or Exchange. No surrender charge will be imposed if you accept ALSO and Surrender, Trade In or Exchange your Existing Policy. See "Appendix A - Enhancement Amount Calculation" for more information regarding how the Enhancement Amount is calculated.

Who Qualifies for ALSO

ALSO is available to Existing Policy Owners who meet all of the following conditions on the Transaction Date ("Eligible Owners"):

You must be the Owner of an in force Existing Policy;

You must have an in force Eligible Rider under the Existing Policy;

Your policy value and cash surrender value under the Existing Policy must be less than 0.80% of the annuitization base under the Eligible Rider;

The oldest Owner must be younger than the New Policy' s maximum issue age if you want to Trade In your Existing Policy; You must not have annuitized your Existing Policy; and Your Existing Policy must not be part of an ERISA (Employee Retirement Income Security Act of 1974)-governed qualified plan (other than a SEP IRA or SIMPLE IRA). Additionally, ALSO may further be limited by the Company, in its sole discretion if it is determined that offering ALSO to other types of owners could create issues for the Company under ERISA and/or the Internal Revenue Code.

How ALSO Works

If all conditions of ALSO are satisfied, we will process your Surrender, Trade In, or Exchange on the Transaction Date. We will add the Enhancement Amount to your cash surrender value immediately before we process your Surrender, Trade In, or Exchange. No surrender charges under the Existing Policy will be applied to any Surrender, Trade In or Exchange under ALSO. If you request a Surrender, then the Enhancement Amount will be included as part of your surrender proceeds. If you request a Trade In or Exchange then the Enhancement Amount will be included in the amount used to purchase your New Policy or Replacement Policy.

The Transaction Date will not occur until all applicable requirements of ALSO are satisfied. Additional requirements may apply if you elect a Trade In to a New Policy or an Exchange to a Replacement Policy. Transactions requested but not completed due to your failure to provide sufficient information, or for any other reason beyond the control of the Company, will not be eligible for ALSO.

All surrenders, trade ins, exchanges, and elections will be final. Once you have accepted ALSO, any exchange back to the Existing Policy will not be permitted.

Considerations Regarding Accepting ALSO

The Company cannot recommend a course of action for you. Please consult your financial representative and tax advisor who can help ensure that you have all the facts before you make a decision. Set out below are several facts that you may want to keep in mind when making your decision:

You will not incur surrender charges under the Existing Policy if you accept ALSO and surrender, trade in, or exchange your Existing Policy. Also, there is no surrender charge applicable to any owner who surrenders a New Policy during the accumulation phase. *However, there may be surrender charges under a Replacement Policy or if an owner annuitizes their New Policy and selects the Lifetime Income- Life with Emergency CashSM or Joint and Survivor Annuity-Life with Emergency CashSM option and surrenders during the first four years of annuitization.*

A Surrender, Trade In, or Exchange will terminate your Existing Policy and all of its benefits. This means, for example, that if you accept ALSO then you will lose the benefits of the Eligible Rider under the Existing Policy. Specifically, if you accept ALSO, then the amount you receive upon surrender, trade in, or exchange of your Existing Policy (including the Enhancement Amount) will be less than the annuitization base under the Eligible Rider. Accordingly, you should not accept ALSO if you intend to annuitize your Existing Policy using the benefits under the Eligible Rider. Accepting ALSO also means you will lose the Existing Policy' s death benefit. The Existing Policy' s death benefit could be greater than the death benefit under the New Policy or a Replacement Policy.

A Surrender of the Existing Policy may be taxable to you. A 10% tax penalty also may apply if taken before age 59 1/2. You should consult your tax advisor about the tax consequences of accepting ALSO.

If you are considering a Trade In or an Exchange, please remember that annuities are not all alike. You should carefully compare the features of your Existing Policy to those of the New Policy or a Replacement Policy. You should also know that your financial representative may have a financial incentive to recommend a Trade In or Exchange.

Certain benefits and features under your Existing Policy may not be available under the New Policy or any other Replacement Policy. By accepting ALSO you would lose these benefits and features under your Existing Policy and not be able to get them back.

If you request a Trade In or an Exchange, please remember that the owner (and potentially the annuitant) under the New Policy or Replacement Policy must be the same as under the Existing Policy.

The Enhancement Amount may be taxable income to you when withdrawn. You may wish to consult your tax advisor about the tax consequences of receiving the Enhancement Amount.

Consult your personal financial representative to discuss whether accepting ALSO would be suitable for your financial, retirement and insurance needs. Moreover, after taking into account all these factors and your individual circumstances, you, after consultation with your financial representative and tax advisor, should independently determine that your cash surrender value plus the Enhancement Amount represents a fair value in exchange for your Existing Policy.

In evaluating ALSO it is important for you to consider a number of things, some of which are discussed above. In addition to all of the things you and your financial representative and tax advisor consider, please also consider the following two questions:

1. Do I still need the guaranteed lifetime income provided by the Eligible Rider? If you do, and after consultation with your financial representative and tax advisor you conclude there are not other alternatives that fulfill your needs, then ALSO is most likely not appropriate for you. If, on the other hand, your circumstances have changed and the guaranteed lifetime income provided by the Eligible Rider is not important (or if there is an alternative or other income product that fulfills your needs), then you may want to consider ALSO and decide if it is appropriate for you.
2. Do I still need the death benefit provided by the Existing Policy? If you do, and after consultation with your financial representative and tax advisor you conclude there are not other alternatives that fulfill your needs, then ALSO is most likely not appropriate for you. If, on the other hand, your circumstances have changed and the death benefit provided by the Existing Policy is not important (or if there is an alternative or other death benefit that fulfills your needs), then you may want to consider ALSO and decide if it is appropriate for you.

How To Accept ALSO

If you decide you want to *surrender* your Existing Policy and want us to send you a check for the cash surrender value plus the Enhancement Amount, simply contact your financial representative who can assist you with the necessary steps. Remember that this may be a taxable event for you, so you should consult your tax advisor. To request a surrender, you must also send the Company the Existing Policy (unless lost or destroyed).

If you decide you want to *trade in* your Existing Policy for a New Policy, you should contact your financial representative, who will be able to explain the features of the New Policy and the terms of ALSO, and provide you with the proper forms and application necessary to complete the transaction. To request a trade in, you must send to the Company the Existing Policy (unless lost or destroyed) and all information needed to issue the New Policy.

If you decide you want to *exchange* your Existing Policy for another company's life or annuity product, you should contact a financial representative for that company, return the Existing Policy (unless lost or destroyed), and return any forms provided to you by the other company that are necessary to complete this transaction.

Partial surrenders, partial trade ins and partial exchanges are not permitted under ALSO.

The Company reserves the right to suspend or terminate, in whole or in part, ALSO at any time. The Company also reserves the right to modify the terms of ALSO at any time prior to the receipt of your acceptance and other information necessary to process your transaction. The Company reserves the right to offer different or even more favorable terms and conditions to Existing Policy Owners through future offers. ALSO may not be available in all states or for all policies.

Existing Policies:

Product	Policy Nos.
Advisor' s Edge [®] Variable Annuity	AV515 101 130 600
Advisor' s Edge Select [®] Variable Annuity	AV516 101 131 600
Dreyfus/Transamerica Triple Advantage [®] Variable Annuity	AV696 101 145 901; GNC-33-194; 1-502 11-194
Portfolio Select SM Variable Annuity	AV288 101 95 796; AV721 101 149 1001
Premier Asset Builder SM Variable Annuity	AV288 101 95 796; AV721 101 149 1001
Principal-Plus SM Variable Annuity	AV288 101 95 796
Privilege Select SM Variable Annuity	AV288 101 95 796
Retirement Income Builder SM Variable Annuity	AV288 101 95 796
Retirement Income Builder SM II Variable Annuity	AV288 101 95 796
Retirement Income Builder SM IV (also known as Retirement Income Builder-BAI Variable Annuity)	AV721 101 149 1001
The Atlas Portfolio Builder Variable Annuity	AV337 101 100 397
Transamerica Access Variable Annuity	AV432 101 114 199CRT; AV474 101 122 1099
Transamerica Extra SM Variable Annuity	AV432 101 114 199CRT; AV710 101 147 102; AV630 101 138 101; AV464 101 121 799
Transamerica Freedom SM Variable Annuity	AV212 101 75 1292; AV265 101 89 396; AV339 101 101 497; AV400 101 107 198
Transamerica Landmark SM Variable Annuity	AV201 101 65 189; AV254 101 87 196; AV320 101 99 197; AV376 101 106 1197; AV432 101 114 199CRT; AV494 101 124 100; AV620 101 137 101; AV720 101 148 102
Transamerica Opportunity Builder (also known as Flexible Premium Variable Annuity - A)	AV721 101 149 1001
Transamerica Preferred Advantage Variable Annuity	AV721 101 149 1001
WRL Freedom Access [®] Variable Annuity	WL17
WRL Freedom Attainer [®] Variable Annuity	VA00010
WRL Freedom Bellwether [®] Variable Annuity	VA00010
WRL Freedom Conqueror [®] Variable Annuity	VA00010
WRL Freedom Enhancer [®] Variable Annuity	VA25
WRL Freedom Premier [®] Variable Annuity	WL18
WRL Freedom Variable Annuity	VA.02.06.88
WRL Freedom Wealth Creator [®] Variable Annuity	VA16

Eligible Riders:

Rider Name	Rider Nos.
Family Income Protector	RGMI 1 798
Managed Annuity Program	RGMI 15 0301
Managed Annuity Program II	RGMI 21 0902
Guaranteed Minimum Income Benefit Rider (Dreyfus)	RGMI 7 1099; RGMI 8 1099; RGMI 16 1101
Guaranteed Minimum Income Benefit Rider (WRL)	GIB01; GIB02
Guaranteed Minimum Income Benefit Rider (Advisor)	RGMI 17 0102

Comparison of the Existing Policy and the New Policy

This section is applicable to Eligible Owners considering trading in the Existing Policy for a New Policy. Set out below is a chart that provides a summary comparison of some of the important features of your Existing Policy and the New Policy. Do not rely solely on

this chart in examining the differences between your Existing Policy and the New Policy; read and carefully consider your Existing Policy including any riders and endorsements thereto, prospectus and other information pertaining to the New Policy. There may be additional differences important for you to consider prior to requesting a Trade In. Please note, this chart does not create or modify any existing rights or benefits all of which are only established by your Existing Policy.

You should consider the investment objectives, risks, charges and expenses of an investment in any policy carefully before investing. Each product prospectus as well as the underlying portfolio prospectuses contains this and other information about the variable annuities and underlying investment options. Your financial representative can provide you with prospectuses for one or more of these variable annuities and the underlying portfolios and can help you decide upon the product that would be most advantageous for you given your individual needs. Please read prospectuses carefully before investing.

	New Policies	Existing Policies ²
	<i>Transamerica Freedom Variable Annuity</i> <i>Form Nos.: AV864 101 165 103</i>	<i>Advisors Edge Variable Annuity</i> <i>Form No.: AV515 101 130 600</i>
<i>Annual Service Charge</i>	\$35 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)	\$30 (reserves right to charge fee - waived if policy value or sum of premiums less withdrawals \geq \$50,000)
<i>Mortality and Expense Risk Charge (different charges may apply after annuitization)</i>	1.55%	0.45%
<i>Access Rider (Required for Principium II and Axiom)</i>	NA	NA
<i>Administrative Charge</i>	0.15%	0.15%
<i>Variable Investment Options Class</i>	Service Class	Initial Class; Service Class
<i>Guaranteed Minimum Annual Rate on the Fixed Account</i>	2%	3%
<i>Premium Enhancement</i>	No	No
<i>Standard Death Benefit ³</i>	Generally, the greater of: account value; and return of premium value. (subject to limitations)	Generally: account value (subject to limitations)
<i>Optional Death Benefits ^{1, 3}</i>	Annual Step-Up	Return of Premium; 6 Year Step-Up; Double Enhanced
<i>Living Benefit Riders (includes Eligible Riders (see Appendix B for rider comparison information) ^{2, 4}</i>	Living Benefits Rider; Retirement Income Choice [®] 1.2; Retirement Income Max SM ; Income Link [®]	Guaranteed Minimum Income Benefit
<i>Other Optional Riders ^{1, 4}</i>	Additional Death Distribution; Additional Death Distribution +; IPG	Additional Death Benefit; Additional Death Benefit - Extra; IPG

	New Policies	Existing Policies ²
	<i>Transamerica Freedom Variable Annuity Form Nos.: AV864 101 165 103</i>	<i>Advisors Edge Select Variable Annuity Form No.: AV516 101 131 600</i>
<i>Annual Service Charge</i>	\$35 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)	\$30 (reserves right to charge fee - waived if policy value or sum of premiums less withdrawals \geq \$50,000)
<i>Mortality and Expense Risk Charge (different charges may apply after annuitization)</i>	1.55%	1.30%
<i>Access Rider (Required for Principium II and Axiom)</i>	NA	NA
<i>Administrative Charge</i>	0.15%	0.15%
<i>Variable Investment Options Class</i>	Service Class	Initial Class; Service Class
<i>Guaranteed Minimum Annual Rate on the Fixed Account</i>	2%	3%
<i>Premium Enhancement</i>	No	No
<i>Standard Death Benefit ³</i>	Generally, the greater of: account value; and return of premium value. (subject to limitations)	Generally: account value (subject to limitations)
<i>Optional Death Benefits ^{1, 3}</i>	Annual Step-Up	Return of Premium; 6 Year Step-Up; Double Enhanced
<i>Living Benefit Riders (includes Eligible Riders) (see Appendix B for rider comparison information) ^{2, 4}</i>	Living Benefits Rider; Retirement Income Choice [®] 1.2; Retirement Income Max SM ; Income Link [®]	Guaranteed Minimum Income Benefit
<i>Other Optional Riders ^{1, 4}</i>	Additional Death Distribution; Additional Death Distribution +	Additional Death Distribution; Additional Death Distribution - II

	New Policies	Existing Policies ²
	<i>Transamerica Freedom Variable Annuity</i> <i>Form Nos.: AV864 101 165 103</i>	<i>Dreyfus/Transamerica Triple Advantage Variable Annuity</i> <i>Form Nos.: AV696 101 145 901; GNC-33-194; 1-502 11-194</i>
<i>Annual Service Charge</i>	\$35 (waived if policy value or sum of premiums less withdrawals ≥\$50,000)	\$30 (certain policies); \$35 (waived if policy value or sum of premiums less withdrawals ≥\$50,000)
<i>Mortality and Expense Risk Charge (different charges may apply after annuitization)</i>	1.55%	1.15% (certain policies only); 1.25%
<i>Access Rider (Required for Principium II and Axiom)</i>	NA	NA
<i>Administrative Charge</i>	0.15%	0.15%
<i>Variable Investment Options Class</i>	Service Class	Initial Class (certain policies only); Service Class
<i>Guaranteed Minimum Annual Rate on the Fixed Account</i>	2%	3.5% (certain policies only); 3% (certain policies only); 2%
<i>Premium Enhancement</i>	No	No
<i>Standard Death Benefit</i> ³	Generally, the greater of: account value; and return of premium value. (subject to limitations)	Generally, the greater of: account value; return of premium value; compounding value (certain policies only); and anniversary value (certain policies only). (subject to limitations)
<i>Optional Death Benefits</i> ^{1, 3}	Annual Step-Up	Annual Step-Up; Double Enhanced
<i>Living Benefit Riders (includes Eligible Riders) (see Appendix B for rider comparison information)</i> ^{2, 4}	Living Benefits Rider; Retirement Income Choice [®] 1.2; Retirement Income Max SM ; Income Link [®]	Guaranteed Minimum Income Benefit
<i>Other Optional Riders</i> ^{1, 4}	Additional Death Distribution; Additional Death Distribution +	Liquidity Rider; Premium Accelerator; Additional Death Benefit; Additional Death Benefit II; Tax Relief; IPG

	New Policies	Existing Policies ²
	<i>Transamerica Freedom Variable Annuity</i> <i>Form Nos.: AV864 101 165 103</i>	<i>Portfolio Select Variable Annuity</i> <i>Form Nos.: AV288, 101 95 796; AV721 101 149 1001</i>
<i>Annual Service Charge</i>	\$35 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)	\$30 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)
<i>Mortality and Expense Risk Charge (different charges may apply after annuitization)</i>	1.55%	1.10%
<i>Access Rider (Required for Principium II and Axiom)</i>	NA	NA
<i>Administrative Charge</i>	0.15%	0.15%
<i>Variable Investment Options Class</i>	Service Class	Initial (certain policies only); Service Class
<i>Guaranteed Minimum Annual Rate on the Fixed Account</i>	2%	3% (certain policies only) 2%
<i>Premium Enhancement</i>	No	No
<i>Standard Death Benefit ³</i>	Generally, the greater of: account value; and return of premium value. (subject to limitations)	Generally, the greater of: account value; and return of premium value. (subject to limitations)
<i>Optional Death Benefits ^{1, 3}</i>	Annual Step-Up	Annual Step-Up; Annually Compounding (certain policies only); Enhanced (certain policies only)
<i>Living Benefit Riders (includes Eligible Riders) (see Appendix B for rider comparison information) ^{2, 4}</i>	Living Benefits Rider; Retirement Income Choice [®] 1.2; Retirement Income Max SM ; Income Link [®]	Family Income Protector; Managed Annuity Program; Managed Annuity Program II
<i>Other Optional Riders ^{1, 4}</i>	Additional Death Distribution; Additional Death Distribution +	Value Rider; Liquidity Rider; Beneficiary Earnings Enhancement; Beneficiary Earnings Enhancement - Extra; Beneficiary Earnings Enhancement - Extra II; IPG

	New Policies	Existing Policies ²
	<i>Transamerica Freedom Variable Annuity</i> <i>Form Nos.: AV864 101 165 103</i>	<i>Premier Asset Builder Variable Annuity</i> <i>Form Nos.: AV288 101 95 796; AV721 101 149 1001</i>
<i>Annual Service Charge</i>	\$35 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)	\$30 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)
<i>Mortality and Expense Risk Charge (different charges may apply after annuitization)</i>	1.55%	1.10%
<i>Access Rider (Required for Principium II and Axiom)</i>	NA	NA
<i>Administrative Charge</i>	0.15%	0.15%
<i>Variable Investment Options Class</i>	Service Class	Initial Class (certain policies only); Service Class
<i>Guaranteed Minimum Annual Rate on the Fixed Account</i>	2%	3% (certain policies only) 2%
<i>Premium Enhancement</i>	No	No
<i>Standard Death Benefit ³</i>	Generally, the greater of: account value; and return of premium value. (subject to limitations)	Generally, the greater of: account value; and return of premium value. (subject to limitations)
<i>Optional Death Benefits ^{1, 3}</i>	Annual Step-Up	Annual Step-Up; Annually Compounding (certain policies only); Enhanced (certain policies only)
<i>Living Benefit Riders (includes Eligible Riders) (see Appendix B for rider comparison information) ^{2, 4}</i>	Living Benefits Rider; Retirement Income Choice [®] 1.2; Retirement Income Max SM ; Income Link [®]	Family Income Protector; Managed Annuity Program; Managed Annuity Program II
<i>Other Optional Riders ^{1, 4}</i>	Additional Death Distribution; Additional Death Distribution +	Liquidity Rider; Beneficiary Earnings Enhancement; Beneficiary Earnings Enhancement - Extra; Beneficiary Earnings Enhancement - Extra II; IPG

	New Policies	Existing Policies ²
	<i>Transamerica Freedom Variable Annuity</i> <i>Form Nos.: AV864 101 165 103</i>	<i>Principal-Plus Variable Annuity</i> <i>Form No.: AV288 101 95 796</i>
<i>Annual Service Charge</i>	\$35 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)	\$30 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)
<i>Mortality and Expense Risk Charge (different charges may apply after annuitization)</i>	1.55%	1.10%
<i>Access Rider (Required for Principium II and Axiom)</i>	NA	NA
<i>Administrative Charge</i>	0.15%	0.15%
<i>Variable Investment Options Class</i>	Service Class	Initial Class; Service Class
<i>Guaranteed Minimum Annual Rate on the Fixed Account</i>	2%	3%
<i>Premium Enhancement</i>	No	Yes
<i>Standard Death Benefit ³</i>	Generally, the greater of: account value; and return of premium value. (subject to limitations)	Generally, the greater of: account value; and return of premium value. (subject to limitations)
<i>Optional Death Benefits ^{1, 3}</i>	Annual Step-Up	Annual Step-Up; 5% Annually Compounding
<i>Living Benefit Riders (includes Eligible Riders) (see Appendix B for rider comparison information) ^{2, 4}</i>	Living Benefits Rider; Retirement Income Choice [®] 1.2; Retirement Income Max SM ; Income Link [®]	Family Income Protector; Managed Annuity Program; Managed Annuity Program II
<i>Other Optional Riders ^{1, 4}</i>	Additional Death Distribution; Additional Death Distribution +	Beneficiary Earnings Enhancement; Beneficiary Earnings Enhancement - Extra

	New Policies	Existing Policies ²
	<i>Transamerica Freedom Variable Annuity</i> <i>Form Nos.: AV864 101 165 103</i>	<i>Privilege Select Variable Annuity</i> <i>Form No.: AV288 101 95 796</i>
<i>Annual Service Charge</i>	\$35 (waived if policy value or sum of premiums less withdrawals ≥\$50,000)	\$30 (waived if policy value or sum of premiums less withdrawals ≥\$50,000)
<i>Mortality and Expense Risk Charge (different charges may apply after annuitization)</i>	1.55%	1.10%
<i>Access Rider (Required for Principium II and Axiom)</i>	NA	NA
<i>Administrative Charge</i>	0.15%	0.15%
<i>Variable Investment Options Class</i>	Service Class	Initial Class; Service Class
<i>Guaranteed Minimum Annual Rate on the Fixed Account</i>	2%	3%
<i>Premium Enhancement</i>	No	No
<i>Standard Death Benefit ³</i>	Generally, the greater of: account value; and return of premium value. (subject to limitations)	Generally, the greater of: account value; and return of premium value. (subject to limitations)
<i>Optional Death Benefits ^{1, 3}</i>	Annual Step-Up	Annual Step-Up; 5% Annually Compounding; 5% Growth
<i>Living Benefit Riders (including Eligible Riders) (see Appendix B for rider comparison information) ^{2, 4}</i>	Living Benefits Rider; Retirement Income Choice [®] 1.2; Retirement Income Max SM ; Income Link [®]	Family Income Protector; Managed Annuity Program; Managed Annuity Program II
<i>Other Optional Riders ^{1, 4}</i>	Additional Death Distribution; Additional Death Distribution +	Beneficiary Earnings Enhancement; Beneficiary Earnings Enhancement - Extra

	New Policies	Existing Policies ²
	<i>Transamerica Freedom Variable Annuity</i> <i>Form Nos.: AV864 101 165 103</i>	<i>Retirement Income Builder Variable Annuity</i> <i>Form No.: AV288 101 95 796</i>
<i>Annual Service Charge</i>	\$35 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)	\$30 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)
<i>Mortality and Expense Risk Charge (different charges may apply after annuitization)</i>	1.55%	1.10%
<i>Access Rider (Required for Principium II and Axiom)</i>	NA	NA
<i>Administrative Charge</i>	0.15%	0.15%
<i>Variable Investment Options Class</i>	Service Class	Initial Class
<i>Guaranteed Minimum Annual Rate on the Fixed Account</i>	2%	3%
<i>Premium Enhancement</i>	No	No
<i>Standard Death Benefit ³</i>	Generally, the greater of: account value; and return of premium value. (subject to limitations)	Generally, the greater of: account value; and return of premium value. (subject to limitations)
<i>Optional Death Benefits ^{1, 3}</i>	Annual Step-Up	Annual Compounding; Annual Step-Up
<i>Living Benefit Riders (includes Eligible Riders) (see Appendix B for rider comparison information) ^{2, 4}</i>	Living Benefits Rider; Retirement Income Choice [®] 1.2; Retirement Income Max SM ; Income Link [®]	Family Income Protector; Managed Annuity Program; Managed Annuity Program II
<i>Other Optional Riders ^{1, 4}</i>	Additional Death Distribution; Additional Death Distribution +	Beneficiary Earnings Enhancement; Beneficiary Earnings Enhancement - Extra; Beneficiary Earnings Enhancement - Extra II

	New Policies	Existing Policies ²
	<i>Transamerica Freedom Variable Annuity Form Nos.: AV864 101 165 103</i>	<i>Retirement Income Builder II Variable Annuity Form No.: AV288 101 95 796</i>
<i>Annual Service Charge</i>	\$35 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)	\$30 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)
<i>Mortality and Expense Risk Charge (different charges may apply after annuitization)</i>	1.55%	1.10%
<i>Access Rider (Required for Principium II and Axiom)</i>	NA	NA
<i>Administrative Charge</i>	0.15%	0.15%
<i>Variable Investment Options Class</i>	Service Class	Initial Class (certain policies only); Service Class
<i>Guaranteed Minimum Annual Rate on the Fixed Account</i>	2%	3%
<i>Premium Enhancement</i>	No	No
<i>Standard Death Benefit ³</i>	Generally, the greater of: account value; and return of premium value. (subject to limitations)	Generally, the greater of: account value; and return of premium value. (subject to limitations)
<i>Optional Death Benefits ^{1, 3}</i>	Annual Step-Up	Annual Compounding; Annual Step-Up
<i>Living Benefit Riders (includes Eligible Riders) (see Appendix B for rider comparison information) ^{2, 4}</i>	Living Benefits Rider; Retirement Income Choice [®] 1.2; Retirement Income Max SM ; Income Link [®]	Family Income Protector
<i>Other Optional Riders ^{1, 4}</i>	Additional Death Distribution; Additional Death Distribution +	Beneficiary Earnings Enhancement

	New Policies	Existing Policies ²
	<i>Transamerica Freedom Variable Annuity</i> <i>Form Nos.: AV864 101 165 103</i>	<i>Retirement Income Builder IV</i> <i>Form Nos.: AV721 101 149 1001</i>
<i>Annual Service Charge</i>	\$35 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)	\$30 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)
<i>Mortality and Expense Risk Charge (different charges may apply after annuitization)</i>	1.55%	1.10% (certain policies only); 1.15%
<i>Access Rider (Required for Principium II and Axiom)</i>	NA	NA
<i>Administrative Charge</i>	0.15%	0.15%
<i>Variable Investment Options Class</i>	Service Class	Initial Class (certain policies only); Service Class
<i>Guaranteed Minimum Annual Rate on the Fixed Account</i>	2%	3% (certain policies only); 2%
<i>Premium Enhancement</i>	No	No
<i>Standard Death Benefit ³</i>	Generally, the greater of: account value; and return of premium value. (subject to limitations)	Generally, the greater of: account value; and return of premium value. (subject to limitations)
<i>Optional Death Benefits ^{1, 3}</i>	Annual Step-Up	Annual Step-Up; Enhanced
<i>Living Benefit Riders (includes Eligible Riders) (see Appendix B for rider comparison information) ^{2, 4}</i>	Living Benefits Rider; Retirement Income Choice [®] 1.2; Retirement Income Max SM ; Income Link [®]	Managed Annuity Program; Managed Annuity Program II
<i>Other Optional Riders ^{1, 4}</i>	Additional Death Distribution; Additional Death Distribution +	Beneficiary Earnings Enhancement; Beneficiary Earnings Enhancement - Extra; Beneficiary Earnings Enhancement - Extra II; Liquidity Rider; Value Rider; IPG

	New Policies	Existing Policies ²
	<i>Transamerica Freedom Variable Annuity Form Nos.: AV864 101 165 103</i>	<i>The Atlas Portfolio Builder Variable Annuity Form No.: AV337 101 100 397</i>
<i>Annual Service Charge</i>	\$35 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)	None
<i>Mortality and Expense Risk Charge (different charges may apply after annuitization)</i>	1.55%	1.25%
<i>Access Rider (Required for Principium II and Axiom)</i>	NA	NA
<i>Administrative Charge</i>	0.15%	0.15%
<i>Variable Investment Options Class</i>	Service Class	Initial Class (certain policies only); Service Class
<i>Guaranteed Minimum Annual Rate on the Fixed Account</i>	2%	3% (certain policies only); 2%
<i>Premium Enhancement</i>	No	No
<i>Standard Death Benefit ³</i>	Generally, the greater of: account value; and return of premium value. (subject to limitations)	Generally, the greater of: account value; return of premium value; compounding value (certain policies only); and annual step-up (certain policies only). (subject to limitations)
<i>Optional Death Benefits ^{1, 3}</i>	Annual Step-Up	None
<i>Living Benefit Riders (includes Eligible Riders) (see Appendix B for rider comparison information) ^{2, 4}</i>	Living Benefits Rider; Retirement Income Choice [®] 1.2; Retirement Income Max SM ; Income Link [®]	Managed Annuity Program; Managed Annuity Program II
<i>Other Optional Riders ^{1, 4}</i>	Additional Death Distribution; Additional Death Distribution +	Beneficiary Earnings Enhancement; Beneficiary Earnings Enhancement - Extra; IPG

	New Policies	Existing Policies ²
	<i>Transamerica Freedom Variable Annuity</i> <i>Form Nos.: AV864 101 165 103</i>	<i>Transamerica Access Variable Annuity</i> <i>Form Nos.: AV432 101 114 199CRT; AV474 101 122 1099</i>
<i>Annual Service Charge</i>	\$35 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)	\$30 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)
<i>Mortality and Expense Risk Charge (different charges may apply after annuitization)</i>	1.55%	1.30%
<i>Access Rider (Required for Principium II and Axiom)</i>	NA	NA
<i>Administrative Charge</i>	0.15%	0.40%
<i>Variable Investment Options Class</i>	Service Class	Initial Class (certain policies only); Service Class
<i>Guaranteed Minimum Annual Rate on the Fixed Account</i>	2%	3%
<i>Premium Enhancement</i>	No	No
<i>Standard Death Benefit ³</i>	Generally, the greater of: account value; and return of premium value. (subject to limitations)	Generally, the greater of: account value; and return of premium value. (subject to limitations)
<i>Optional Death Benefits ^{1, 3}</i>	Annual Step-Up	Annually Compounding; Annual Step-Up
<i>Living Benefit Riders (includes Eligible Riders) (see Appendix B for rider comparison information) ^{2, 4}</i>	Living Benefits Rider; Retirement Income Choice [®] 1.2; Retirement Income Max SM ; Income Link [®]	Family Income Protector; Managed Annuity Program; Managed Annuity Program II
<i>Other Optional Riders ^{1, 4}</i>	Additional Death Distribution; Additional Death Distribution +	Additional Death Distribution

	New Policies	Existing Policies ²
	<i>Transamerica Freedom Variable Annuity Form Nos.: AV864 101 165 103</i>	<i>Transamerica EXTRA Variable Annuity Form Nos.: AV432 101 114 199CRT; AV710 101 147 102; AV630 101 138 101; AV464 101 121 799</i>
<i>Annual Service Charge</i>	\$35 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)	\$40 (waived if policy value or sum of premiums less withdrawals \geq \$100,000)
<i>Mortality and Expense Risk Charge (different charges may apply after annuitization)</i>	1.55%	1.60% (1.15% after 9 th year) (certain policies only); 1.35% (1.15% after the 9 th policy year) (certain policies only); 1.35% (certain policies only)
<i>Access Rider (Required for Principium II and Axiom)</i>	NA	NA
<i>Administrative Charge</i>	0.15%	0.40% (certain policies only); 0.15%
<i>Variable Investment Options Class</i>	Service Class	Initial Class (certain policies only); Service Class
<i>Guaranteed Minimum Annual Rate on the Fixed Account</i>	2%	3% (certain policies only); 1.5%
<i>Premium Enhancement</i>	No	Yes
<i>Standard Death Benefit ³</i>	Generally, the greater of: account value; and return of premium value. (subject to limitations)	Generally, the greater of: account value; and return of premium value. (subject to limitations)
<i>Optional Death Benefits ^{1, 3}</i>	Annual Step-Up	Double Enhanced; Step-up
<i>Living Benefit Riders (includes Eligible Riders) (see Appendix B for rider comparison information) ^{2, 4}</i>	Living Benefits Rider; Retirement Income Choice [®] 1.2; Retirement Income Max SM ; Income Link [®]	Family Income Protector; Managed Annuity Program; Managed Annuity Program II
<i>Other Optional Riders ^{1, 4}</i>	Additional Death Distribution; Additional Death Distribution +	Additional Death Distribution; Additional Death Distribution +; IPG

	New Policies	Existing Policies ²
	<i>Transamerica Freedom Variable Annuity</i> <i>Form Nos.: AV864 101 165 103</i>	<i>Transamerica Freedom Variable Annuity</i> <i>Form Nos.: AV212 101 75 1292; AV265 101 89 396; AV339 101 101 497; AV400 101 107 198;</i>
<i>Annual Service Charge</i>	\$35 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)	\$35 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)
<i>Mortality and Expense Risk Charge (different charges may apply after annuitization)</i>	1.55%	1.10%
<i>Access Rider (Required for Principium II and Axiom)</i>	NA	NA
<i>Administrative Charge</i>	0.15%	0.15% Distribution Financing Charge of 0.25% first ten policy years (certain policies only)
<i>Variable Investment Options Class</i>	Service Class	Initial Class (certain policies only); Service Class
<i>Guaranteed Minimum Annual Rate on the Fixed Account</i>	2%	3%
<i>Premium Enhancement</i>	No	No
<i>Standard Death Benefit</i> ³	Generally, the greater of: account value; and return of premium value. (subject to limitations)	Generally, the greater of: account value; and return of premium value. (subject to limitations)
<i>Optional Death Benefits</i> ^{1, 3}	Annual Step-Up	Annually Compounding; Annual Step-Up; Double Enhanced
<i>Living Benefit Riders (includes Eligible Riders) (see Appendix B for rider comparison information)</i> ^{2, 4}	Living Benefits Rider; Retirement Income Choice [®] 1.2; Retirement Income Max SM ; Income Link [®]	Family Income Protector; Managed Annuity Program; Managed Annuity Program II
<i>Other Optional Riders</i> ^{1, 4}	Additional Death Distribution; Additional Death Distribution +	Additional Death Distribution; Additional Death Distribution +; IPG

	New Policies	Existing Policies ²
	<i>Transamerica Freedom Variable Annuity</i> <i>Form Nos.: AV864 101 165 103</i>	<i>Transamerica Landmark Variable Annuity</i> <i>Form Nos.: AV201 101 65 189; AV254 101 87 196; AV320 101 99 197; AV376 101 106 1197; AV432 101 114 199CRT; AV494 101 124 100; AV620 101 137 101; AV720 101 148 102</i>
<i>Annual Service Charge</i>	\$35 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)	\$35 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)
<i>Mortality and Expense Risk Charge (different charges may apply after annuitization)</i>	1.55%	1.15% (certain policies only); 1.25%
<i>Access Rider (Required for Principium II and Axiom)</i>	NA	NA
<i>Administrative Charge</i>	0.15%	0.15%
<i>Variable Investment Options Class</i>	Service Class	Initial Class (certain policies only); Service Class
<i>Guaranteed Minimum Annual Rate on the Fixed Account</i>	2%	4% (certain policies only); 3% (certain policies only); 2%
<i>Premium Enhancement</i>	No	No
<i>Standard Death Benefit ³</i>	Generally, the greater of: account value; and return of premium value. (subject to limitations)	Generally, the greater of: account value; and return of premium value. (subject to limitations)
<i>Optional Death Benefits ^{1, 3}</i>	Annual Step-Up	Annual Step-Up; Double Enhanced; 5% Annually Compounding; Monthly Step-Up
<i>Living Benefit Riders (includes Eligible Riders) (see Appendix B for rider comparison information) ^{2, 4}</i>	Living Benefits Rider; Retirement Income Choice [®] 1.2; Retirement Income Max SM ; Income Link [®]	Family Income Protector; Managed Annuity Program; Managed Annuity Program II
<i>Other Optional Riders ^{1, 4}</i>	Additional Death Distribution; Additional Death Distribution +	Additional Death Distribution; Additional Death Distribution +; Liquidity Rider

	New Policies	Existing Policies ²
	<i>Transamerica Freedom Variable Annuity Form Nos.: AV864 101 165 103</i>	<i>Transamerica Opportunity Builder Form No.: AV721 101 149 1001</i>
<i>Annual Service Charge</i>	\$35 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)	\$30 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)
<i>Mortality and Expense Risk Charge (different charges may apply after annuitization)</i>	1.55%	1.10%
<i>Access Rider (Required for Principium II and Axiom)</i>	NA	NA
<i>Administrative Charge</i>	0.15%	0.15%
<i>Variable Investment Options Class</i>	Service Class	Initial Class; Service Class
<i>Guaranteed Minimum Annual Rate on the Fixed Account</i>	2%	3% (certain policies only) 2%
<i>Premium Enhancement</i>	No	Yes
<i>Standard Death Benefit ³</i>	Generally, the greater of: account value; and return of premium value. (subject to limitations)	Generally, the greater of: account value; and return of premium value. (subject to limitations)
<i>Optional Death Benefits ^{1, 3}</i>	Annual Step-Up	Annual Step-Up; Double Enhanced
<i>Living Benefit Riders (includes Eligible Riders) (see Appendix B for rider comparison information) ^{2, 4}</i>	Living Benefits Rider; Retirement Income Choice [®] 1.2; Retirement Income Max SM ; Income Link [®]	Managed Annuity Program; Managed Annuity Program II
<i>Other Optional Riders ^{1, 4}</i>	Additional Death Distribution; Additional Death Distribution +	Liquidity Rider; Beneficiary Earnings Enhancement; Beneficiary Earnings Enhancement - Extra; Beneficiary Earnings Enhancement - Extra II; IPG

	New Policies	Existing Policies ²
	<i>Transamerica Freedom Variable Annuity</i> <i>Form Nos.: AV864 101 165 103</i>	<i>Transamerica Preferred Advantage Variable Annuity</i> <i>Form No.: AV721 101 149 1001</i>
<i>Annual Service Charge</i>	\$35 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)	\$30 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)
<i>Mortality and Expense Risk Charge (different charges may apply after annuitization)</i>	1.55%	1.10%
<i>Access Rider (Required for Principium II and Axiom)</i>	NA	NA
<i>Administrative Charge</i>	0.15%	0.15%
<i>Variable Investment Options Class</i>	Service Class	Initial Class; Service Class
<i>Guaranteed Minimum Annual Rate on the Fixed Account</i>	2%	3% (certain policies only) 2%
<i>Premium Enhancement</i>	No	No
<i>Standard Death Benefit ³</i>	Generally, the greater of: account value; and return of premium value. (subject to limitations)	Generally, the greater of: account value; and return of premium value. (subject to limitations)
<i>Optional Death Benefits ^{1, 3}</i>	Annual Step-Up	Annual Step-Up; Enhanced
<i>Living Benefit Riders (includes Eligible Riders) (see Appendix B for rider comparison information) ^{2, 4}</i>	Living Benefits Rider; Retirement Income Choice [®] 1.2; Retirement Income Max SM ; Income Link [®]	Family Income Protector; Managed Annuity Program; Managed Annuity Program II
<i>Other Optional Riders ^{1, 4}</i>	Additional Death Distribution; Additional Death Distribution +	Value Rider; Liquidity Rider; Beneficiary Earnings Enhancement; Beneficiary Earnings Enhancement - Extra; Beneficiary Earnings Enhancement - Extra II

	New Policies	Existing Policies ²
	<i>Transamerica Freedom Variable Annuity Form Nos.: AV864 101 165 103</i>	<i>WRL Freedom Access Variable Annuity Form No.: WL17</i>
<i>Annual Service Charge</i>	\$35 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)	\$30 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)
<i>Mortality and Expense Risk Charge (different charges may apply after annuitization)</i>	1.55%	1.25%
<i>Access Rider (Required for Principium II and Axiom)</i>	NA	NA
<i>Administrative Charge</i>	0.15%	0.40%
<i>Variable Investment Options Class</i>	Service Class	Initial Class; Service Class
<i>Guaranteed Minimum Annual Rate on the Fixed Account</i>	2%	3%
<i>Premium Enhancement</i>	No	No
<i>Standard Death Benefit ³</i>	Generally, the greater of: account value; and return of premium value. (subject to limitations)	Generally, the greater of: account value; and return of premium value. (subject to limitations)
<i>Optional Death Benefits ^{1, 3}</i>	Annual Step-Up	Annually Compounding; Annual Step-Up
<i>Living Benefit Riders (includes Eligible Riders (see Appendix B for rider comparison information) ^{2, 4}</i>	Living Benefits Rider; Retirement Income Choice [®] 1.2; Retirement Income Max SM ; Income Link [®]	Guaranteed Minimum Income Benefit
<i>Other Optional Riders ^{1, 4}</i>	Additional Death Distribution; Additional Death Distribution +	Additional Earnings Rider

	New Policies	Existing Policies ²
	<i>Transamerica Freedom Variable Annuity Form Nos.: AV864 101 165 103</i>	<i>WRL Freedom Attainer Variable Annuity Form No.: VA00010</i>
<i>Annual Service Charge</i>	\$35 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)	\$30
<i>Mortality and Expense Risk Charge (different charges may apply after annuitization)</i>	1.55%	1.10%
<i>Access Rider (Required for Principium II and Axiom)</i>	NA	NA
<i>Administrative Charge</i>	0.15%	0.15%
<i>Variable Investment Options Class</i>	Service Class	Initial Class; Service Class
<i>Guaranteed Minimum Annual Rate on the Fixed Account</i>	2%	4%
<i>Premium Enhancement</i>	No	No
<i>Standard Death Benefit ³</i>	Generally, the greater of: account value; and return of premium value. (subject to limitations)	Generally, the greater of: annuity value; highest anniversary value. (subject to limitations)
<i>Optional Death Benefits ^{1, 3}</i>	Annual Step-Up	None
<i>Living Benefit Riders (includes Eligible Riders) (see Appendix B for rider comparison information) ^{2, 4}</i>	Living Benefits Rider; Retirement Income Choice [®] 1.2; Retirement Income Max SM ; Income Link [®]	Guaranteed Minimum Income Benefit
<i>Other Optional Riders ^{1, 4}</i>	Additional Death Distribution; Additional Death Distribution +	Additional Earnings Rider

	New Policies	Existing Policies ²
	<i>Transamerica Freedom Variable Annuity</i> <i>Form Nos.: AV864 101</i> <i>165 103</i>	<i>WRL Freedom</i> <i>Bellwether Variable</i> <i>Annuity</i> <i>Form No.: VA00010</i>
<i>Annual Service Charge</i>	\$35 (waived if policy value or sum of premiums less withdrawals ≥\$50,000)	\$30
<i>Mortality and Expense Risk Charge (different charges may apply after annuitization)</i>	1.55%	1.25%
<i>Access Rider (Required for Principium II and Axiom)</i>	NA	NA
<i>Administrative Charge</i>	0.15%	0.15%
<i>Variable Investment Options Class</i>	Service Class	Initial Class; Service Class
<i>Guaranteed Minimum Annual Rate on the Fixed Account</i>	2%	4%
<i>Premium Enhancement</i>	No	No
<i>Standard Death Benefit ³</i>	Generally, the greater of: account value; and return of premium value. (subject to limitations)	Generally, the greater of: account value; 5% Growth (up to 200%); and highest anniversary value. (subject to limitations)
<i>Optional Death Benefits ^{1, 3}</i>	Annual Step-Up	None
<i>Living Benefit Riders (includes Eligible Riders (see Appendix B for rider comparison information) ^{2, 4}</i>	Living Benefits Rider; Retirement Income Choice [®] 1.2; Retirement Income Max SM ; Income Link [®]	Guaranteed Minimum Income Benefit
<i>Other Optional Riders ^{1, 4}</i>	Additional Death Distribution; Additional Death Distribution +	Additional Earnings Rider

	New Policies	Existing Policies ²
	<i>Transamerica Freedom Variable Annuity</i> <i>Form Nos.: AV864 101</i> <i>165 103</i>	<i>WRL Freedom Conqueror Variable Annuity</i> <i>Form No.: VA00010</i>
<i>Annual Service Charge</i>	\$35 (waived if policy value or sum of premiums less withdrawals ≥\$50,000)	\$35
<i>Mortality and Expense Risk Charge (different charges may apply after annuitization)</i>	1.55%	1.25%
<i>Access Rider (Required for Principium II and Axiom)</i>	NA	NA
<i>Administrative Charge</i>	0.15%	0.15%
<i>Variable Investment Options Class</i>	Service Class	Initial Class; Service Class
<i>Guaranteed Minimum Annual Rate on the Fixed Account</i>	2%	4%
<i>Premium Enhancement</i>	No	No
<i>Standard Death Benefit ³</i>	Generally, the greater of: account value; and return of premium value. (subject to limitations)	Generally, the greater of: cash value; highest anniversary value (certain policies only); and 5% compounding (certain policies only). (subject to limitations)
<i>Optional Death Benefits ^{1, 3}</i>	Annual Step-Up	None
<i>Living Benefit Riders (includes Eligible Riders) (see Appendix B for rider comparison information) ^{2, 4}</i>	Living Benefits Rider; Retirement Income Choice [®] 1.2; Retirement Income Max SM ; Income Link [®]	Guaranteed Minimum Income Benefit
<i>Other Optional Riders ^{1, 4}</i>	Additional Death Distribution; Additional Death Distribution +	Additional Earnings Rider

	New Policies	Existing Policies ²
	<i>Transamerica Freedom Variable Annuity Form Nos.: AV864 101 165 103</i>	<i>WRL Freedom Enhancer Variable Annuity Form No.: VA25</i>
<i>Annual Service Charge</i>	\$35 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)	\$30 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)
<i>Mortality and Expense Risk Charge (different charges may apply after annuitization)</i>	1.55%	1.25%
<i>Access Rider (Required for Principium II and Axiom)</i>	NA	NA
<i>Administrative Charge</i>	0.15%	0.40%
<i>Variable Investment Options Class</i>	Service Class	Initial Class; Service Class
<i>Guaranteed Minimum Annual Rate on the Fixed Account</i>	2%	3%
<i>Premium Enhancement</i>	No	Yes
<i>Standard Death Benefit ³</i>	Generally, the greater of: account value; and return of premium value. (subject to limitations)	Generally, the greater of: account value; return of premium value; and annual step-up. (subject to limitations)
<i>Optional Death Benefits ^{1, 3}</i>	Annual Step-Up	Compounding Minimum Death Benefit
<i>Living Benefit Riders (includes Eligible Riders) (see Appendix B for rider comparison information) ^{2, 4}</i>	Living Benefits Rider; Retirement Income Choice [®] 1.2; Retirement Income Max SM ; Income Link [®]	Guaranteed Minimum Income Benefit
<i>Other Optional Riders ^{1, 4}</i>	Additional Death Distribution; Additional Death Distribution +	Additional Earnings Rider

	New Policies	Existing Policies ²
	<i>Transamerica Freedom Variable Annuity Form Nos.: AV864 101 165 103</i>	<i>WRL Freedom Premier Variable Annuity Form No.: WL18</i>
<i>Annual Service Charge</i>	\$35 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)	\$30 (waived if policy value or sum of premiums less withdrawals \geq \$50,000)
<i>Mortality and Expense Risk Charge (different charges may apply after annuitization)</i>	1.55%	1.00%
<i>Access Rider (Required for Principium II and Axiom)</i>	NA	NA
<i>Administrative Charge</i>	0.15%	0.40%
<i>Variable Investment Options Class</i>	Service Class	Initial Class; Service Class
<i>Guaranteed Minimum Annual Rate on the Fixed Account</i>	2%	3%
<i>Premium Enhancement</i>	No	No
<i>Standard Death Benefit ³</i>	Generally, the greater of: account value; and return of premium value. (subject to limitations)	Generally, the greater of: account value; return of premium value; and monthly step-up. (subject to limitations)
<i>Optional Death Benefits ^{1, 3}</i>	Annual Step-Up	Compounding/Monthly Step-up
<i>Living Benefit Riders (includes Eligible Riders) (see Appendix B for rider comparison information) ^{2, 4}</i>	Living Benefits Rider; Retirement Income Choice [®] 1.2; Retirement Income Max SM ; Income Link [®]	Guaranteed Minimum Income Benefit
<i>Other Optional Riders ^{1, 4}</i>	Additional Death Distribution; Additional Death Distribution +	Additional Earnings Rider

	New Policies	Existing Policies ²
	<i>Transamerica Freedom Variable Annuity</i> <i>Form Nos.: AV864 101 165 103</i>	<i>WRL Freedom Variable Annuity</i> <i>Form No.: VA.02.06.88</i>
<i>Annual Service Charge</i>	\$35 (waived if policy value or sum of premiums less withdrawals ≥\$50,000)	\$30
<i>Mortality and Expense Risk Charge (different charges may apply after annuitization)</i>	1.55%	1.25%
<i>Access Rider (Required for Principium II and Axiom)</i>	NA	NA
<i>Administrative Charge</i>	0.15%	None
<i>Variable Investment Options Class</i>	Service Class	Initial Class; Service Class
<i>Guaranteed Minimum Annual Rate on the Fixed Account</i>	2%	4%
<i>Premium Enhancement</i>	No	No
<i>Standard Death Benefit ³</i>	Generally, the greater of: account value; and return of premium value. (subject to limitations)	Generally, the greater of: account value; return of premium value; and anniversary value. (subject to limitations)
<i>Optional Death Benefits ^{1, 3}</i>	Annual Step-Up	None
<i>Living Benefit Riders (includes Eligible Riders) (see Appendix B for rider comparison information) ^{2, 4}</i>	Living Benefits Rider; Retirement Income Choice [®] 1.2; Retirement Income Max SM ; Income Link [®]	Guaranteed Minimum Income Benefit
<i>Other Optional Riders ^{1, 4}</i>	Additional Death Distribution; Additional Death Distribution +	Additional Earnings Rider

	New Policies	Existing Policies ²
	<i>Transamerica Freedom Variable Annuity</i> <i>Form Nos.: AV864 101 165 103</i>	<i>WRL Freedom Wealth Creator Variable Annuity</i> <i>Form No.: VA16</i>
<i>Annual Service Charge</i>	\$35 (waived if policy value or sum of premiums less withdrawals ≥\$50,000)	\$35
<i>Mortality and Expense Risk Charge (different charges may apply after annuitization)</i>	1.55%	1.40%
<i>Access Rider (Required for Principium II and Axiom)</i>	NA	NA
<i>Administrative Charge</i>	0.15%	None
<i>Variable Investment Options Class</i>	Service Class	Initial Class; Service Class
<i>Guaranteed Minimum Annual Rate on the Fixed Account</i>	2%	3%
<i>Premium Enhancement</i>	No	No
<i>Standard Death Benefit ³</i>	Generally, the greater of: account value; and return of premium value. (subject to limitations)	Generally, the greater of: account value; return of premium value; and highest anniversary value. (subject to limitations)
<i>Optional Death Benefits ^{1, 3}</i>	Annual Step-Up	None
<i>Living Benefit Riders (includes Eligible Riders) (see Appendix B for rider comparison information) ^{2, 4}</i>	Living Benefits Rider; Retirement Income Choice [®] 1.2; Retirement Income Max SM ; Income Link [®]	Guaranteed Minimum Income Benefit
<i>Other Optional Riders ^{1, 4}</i>	Additional Death Distribution; Additional Death Distribution +	Additional Earnings Rider

End Notes:

¹ There is an additional charge for these optional features.

² Eligible Riders are no longer available.

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- ³ Certain death benefits are offered under the New Policies which are also listed as available under Existing Policies. While these death benefits may have the same name they may not be identical and may have differences including different fees and partial withdrawal adjustments.
- ⁴ This chart does not generally list Living Benefit Riders or other optional riders which were not available to Owners of Existing Policies who elected one of the Eligible Riders.

You should review the prospectuses for the Existing Policy and the New Policy, as well as your Existing Policy including any riders and endorsements thereto, carefully with your personal financial representative and tax advisor before you submit a Trade In request to the Company. You may obtain an additional copy of an Existing Policy prospectus or New Policy prospectus free of charge by contacting us at (866) 298-0938.

APPENDIX A

ENHANCEMENT AMOUNT CALCULATION

The following hypothetical examples illustrate how we calculate the Enhancement Amount for an Existing Policy with an Eligible Rider and with and without a surrender charge:

EXAMPLE 1:

Assumptions:

GMIB Base:	\$100,000.00
Policy Value:	\$60,000.00
Surrender Charges:	none
Pro-Rated Rider Fees:	\$150.00 (assumes 1/3 of a year @ 0.45%)
Cash Surrender Value:	\$59,850.00

Offer Amount:

$$\$100,000.00 \times 0.80 = \$80,000.00$$

Offer Amount above Cash Surrender Value:

$$\$80,000.00 - \$59,850.00 = \$20,150.00$$

EXAMPLE 2:

Assumptions:

GMIB Base:	\$100,000.00
Policy Value:	\$60,000.00
Surrender Charges:	\$2,000.000
Pro-Rated Rider Fees:	\$150.00 (assumes 1/3 of a year @ 0.45%)
Cash Surrender Value:	\$57,850.00

Offer Amount:

$$\$100,000.00 \times 0.80 = \$80,000.00$$

Offer Amount above Cash Surrender Value:

$$\$80,000.00 - \$57,850.00 = \$22,150.00$$

APPENDIX B

LIVING BENEFIT RIDER COMPARISON

You should be aware that there are significant differences between the Eligible Riders available under the Existing Policies and the optional living benefit benefits riders under the New Policies. A summary of some important features of the riders appear in the charts below. You should not rely solely on this chart in examining the differences between the riders. Please read and carefully review the terms of your Existing Policy and Eligible Rider, prospectus and other information pertaining to the New Policy.

Benefit Features

The Eligible Riders under the Existing Policies include the following features:

Rider Name(s)	Feature
Family Income Protector	<p>The “family income protector” assures you of a minimum level of income in the future by guaranteeing a minimum annuitization value after 10 years. The minimum annuitization value is:</p> <ul style="list-style-type: none"> the policy value on the date the rider is issued; plus any additional premium payments; minus any adjustment for any withdrawals made after the date the rider is issued; which is accumulated at the annual growth rate; minus any premium taxes. <p>The annual growth rate is currently 6% per year.</p>
Managed Annuity Program	<p>The “managed annuity program” assures you of a minimum level of income in the future by guaranteeing a minimum income base. The minimum income base is:</p> <ul style="list-style-type: none"> the policy value on the date the rider is issued; plus any subsequent premium payments; minus any subsequent partial surrenders; all of which is accumulated at the annual growth rate from the date of each transaction; minus any premium taxes. <p>The annual growth rate is currently 6% per year.</p>
Managed Annuity Program II	<p>The “managed annuity program II” assures you of a minimum level of income in the future by guaranteeing a minimum income base. The minimum income base is:</p> <ul style="list-style-type: none"> the policy value on the date the rider is issued; plus any subsequent premium payments; minus any subsequent adjusted partial surrenders; all of which is accumulated at the annual growth rate from the date of each transaction; minus any premium taxes. <p>The annual growth rate is currently 5% per year.</p>
Guaranteed Minimum Income Benefit (WRL)	<p>The “guaranteed minimum income benefit” assures you of a minimum level of income in the future by guaranteeing a minimum annuitization value. The minimum annuitization value is:</p> <ul style="list-style-type: none"> the annuity value on the date the rider is issued; plus any additional premium payments; minus any adjustment for any withdrawals made after the date the rider is issued; which is accumulated at the annual growth rate; minus any premium taxes. <p>The annual growth rate is currently 6% per year.</p>
Guaranteed Minimum Income Benefit (Dreyfus)	<p>The “guaranteed minimum income benefit” assures you of a minimum level of income in the future by guaranteeing a minimum annuitization value after 7 years. The minimum annuitization value on the rider date (the date the rider is added to your contract) is equal to the account value. After that, the minimum annuitization value is equal to the greater of the following:</p>

- 1) the largest account value on the rider date or on any rider anniversary prior to the annuitant's 81st birthday, plus any subsequent purchase payments (less the sum of all subsequent withdrawals adjusted and any premium taxes after the date of the largest account value); or
- 2) the minimum annuitization value on the rider date plus the sum of all purchase payments received after the rider date, less withdrawals (adjusted as below) and premium taxes, plus interest thereon equal to the annual effective up to:
 - a) the rider anniversary prior to the annuitant's 81st birthday;
 - b) the date the sum of all purchase payments, (less the sum of all adjusted withdrawals and premium taxes), together with credited interest, has grown to two times the amount of all purchase payments (less all adjusted withdrawals and premium taxes) as a result of such interest accumulation, if earlier.

The annual effective interest rate is currently 6% per year.

Guaranteed Minimum Income Benefit (Advisor)	<p>The "guaranteed minimum income benefit" assures you of a minimum level of income in the future by guaranteeing a minimum income base. The minimum income base is:</p> <ul style="list-style-type: none"> the policy value on the date the rider is issued; plus any subsequent premium payments; minus any subsequent partial surrenders; all of which is accumulated at the annual growth rate from the date of each transaction; minus any premium taxes. <p>The annual growth rate is currently 6% per year.</p>
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The optional living benefits under the New Policies include the following features:

Rider Name(s)	Feature
Living Benefits	<p>Guaranteed Minimum Accumulation Benefit ("GMAB")—Ten years after you elect the rider ("guaranteed future value date"), your policy value will equal your guaranteed future value (calculated as described below). After that date, the guaranteed future value equals zero.</p> <p>Guaranteed Minimum Withdrawal Benefit ("GMWB")—a maximum annual withdrawal amount (calculated as described below) regardless of your policy value; we account for withdrawals you take under the rider by applying two different withdrawal guarantees, "principal back," for withdrawals of up to 7% of your total withdrawal base, or "for life," for withdrawals up to 5% of your total withdrawal base.</p>
Retirement Income Choice 1.2	<p>Guaranteed Lifetime Withdrawal Benefit ("GLWB")—i.e., a level of cash withdrawals (and payments from Transamerica, if necessary) regardless of the performance of the designated investment option(s).</p> <p>Growth—On each of the first 10 rider anniversaries, Transamerica adds an annual growth credit (5% of the withdrawal base immediately before the rider anniversary) to the withdrawal base if no withdrawals have occurred during the preceding rider year.</p> <p>Automatic Step-Up— Transamerica will automatically step-up the withdrawal base on each rider anniversary. You can opt out of the automatic step-up if the automatic step-up would result in an increase in the rider fee percentage.</p>
Retirement Income Max	<p>Guaranteed Lifetime Withdrawal Benefit ("GLWB")—i.e., a level of cash withdrawals (and payments from Transamerica, if necessary) regardless of the performance of the designated investment option(s).</p> <p>Growth—On each of the first 10 rider anniversaries, Transamerica adds an annual growth credit (5% of the withdrawal base immediately before the rider anniversary) to the withdrawal base if no withdrawals have occurred during the preceding rider year.</p> <p>Automatic Step-Up— Transamerica will automatically step-up the withdrawal base on each rider anniversary. You can opt out of the automatic step-up if the automatic step-up would result in an increase in the rider fee percentage.</p>
Income Link	<p>Guaranteed Lifetime Withdrawal Benefit ("GLWB")—i.e., a series of cash withdrawals (and payments from Transamerica, if necessary) which are based on a withdrawal percentage that is higher for a defined period and lower thereafter regardless of the performance of the designated investment option(s).</p> <p>Automatic Step-Up— Transamerica will automatically step-up the withdrawal base on each rider anniversary. You can opt out of the automatic step-up if the automatic step-up would result in an increase in the rider fee percentage.</p>

Investment Restrictions

There are no investment restrictions applicable under the Eligible Riders. Investment restrictions apply under the optional living benefits under the New Policies.

Fees

The fees (annual rate, as a % of annuitization base) for the Eligible Riders are currently:

Rider Name	Fee
Family Income Protector	0.30%
Guaranteed Minimum Income Benefit	0.30% - 0.50%
Managed Annuity Program	0.45%

Managed Annuity Program II	0.45%
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The fees (annual rate, as a % of total withdrawal base) for the optional living benefit riders under the New Policies are currently:

Rider Name	Fee
Living Benefits Rider	0.90%
Retirement Income Choice 1.2 Rider	
Base Benefit	0.70% - 1.55%
Open Investment Option	1.25%
<i>Additional Benefits</i>	
Death Benefit	0.25% (single) 0.20% (joint)
Income Enhancement	0.30% (single) 0.50% (joint)
Income Link Rider	0.90%
Retirement Income Max Rider	1.25%

For the optional living benefit riders under the New Policies, the above current rider fees are subject to increase up to a maximum rider fee disclosed in the prospectus in the event of an automatic step up (which you can opt out of).

**This Prospectus Supplement must be accompanied or preceded
by the Prospectus for the
Transamerica FreedomSM Variable Annuity dated May 1, 2012**