EXPLANATION OF TRUST ADMINISTRATION AND INVESTMENT FEEES

The fees for your sub-account include a Trust Administration Fee, an Investment Fee and a Tax Return Preparation Fee.

Trust Administration Fees. The Trust Administration Fees for your sub-account are calculated and charged monthly, in arrears. Using the chart below you may determine the Trust Administration Fees for your sub-account by locating the row that contains the range within which your sub-account's value falls. The fee amount is described in that same row in the right-hand column. By way of example, assume your sub-account has a market value on the last day of a month of \$50,000. \$50,000 falls in the range of \$30,000 - \$100,000 so the fee calculation is described in the third row of the chart, right-hand column. You can calculate that the Trust Administration Fee for that month would be equal to \$91 (\$25 plus $1.56\% \times $50,000/12$).

The Trust Administration Fees are calculated using the market value of your sub-account on the last business day of each month so the Trust Administration Fee will be different every month.

Trust Sub-Account Value	Trust Administration Fees
\$750 - \$10,000	\$0/month + 0.46% per year
\$10,001 - \$30,000	\$15/month + 1.86% per year
\$30,001 - \$100,000	\$25/month + 1.56% per year
\$100,001 - \$150,000	\$33/month + 1.36% per year
\$151,000 - \$250,000	\$46/month + 1.16% per year
\$250,001 or more	\$67/month + 0.81% per year

Investment Fees. The Investment Fees for your sub-account are calculated quarterly and are charged in arrears in the month immediately following each calendar quarter end. The Investment Fees are determined by multiplying the "average value of your sub-account's balance" by 0.50%, dividing that amount by four (as the fee is quarterly) and then subtracting from that amount the management fees that were paid to the mutual fund managers during that calendar quarter. The "average value of your sub-account's value on the last trading day of four months - the three month's in that calendar quarter plus the one month that immediately preceding the calendar quarter.

Because the management fees for the mutual fund managers are credited against the Investment Fees, the Investment Fees shown on your sub-account statement will always total less than 0.50% per year (0.125% per quarter). In other words, if the annual management fees paid to the mutual fund managers equals 0.20%, the annual Investment Fees charged to your sub-account will be only 0.30% (or, on a quarterly basis, if the quarterly management fees paid to the mutual fund managers equals 0.05%, the quarterly Investment Fees charge to your sub-account will be only 0.075%).

The Investment Fees do not include brokerage commissions, dealer spreads and other costs associated with the purchase or sale of securities, custodian fees, interest, taxes and other account expenses. These other fees or expenses are charged at the fund level and they will not appear as transactions on the statement of your sub-account as they simply reduce the net asset value of the fund. Details of these fees are available in each mutual fund's prospectus.

Tax Return Preparation. Your sub-account will be subject to a Tax Return Preparation fee of \$225 per year to be charged in April or May.