

SERFF Tracking Number: PRUD-125904398 State: Arkansas
Filing Company: Pruco Life Insurance Company State Tracking Number: 40927
Company Tracking Number: P-SCH-HD7-DB(1/09)
TOI: A02.1G Group Annuities - Deferred Non- Sub-TOI: A02.1G.002 Flexible Premium
Variable and Variable
Product Name: P-SCH-HD7-DB(1/09)
Project Name/Number: P-SCH-HD7-DB(1/09)/P-SCH-HD7-DB(1/09)

Filing at a Glance

Company: Pruco Life Insurance Company

Product Name: P-SCH-HD7-DB(1/09)

TOI: A02.1G Group Annuities - Deferred Non-
Variable and Variable

Sub-TOI: A02.1G.002 Flexible Premium

Filing Type: Form

SERFF Tr Num: PRUD-125904398 State: ArkansasLH

SERFF Status: Closed

State Tr Num: 40927

Co Tr Num: P-SCH-HD7-DB(1/09)

State Status: Approved-Closed

Co Status: IFSA

Reviewer(s): Linda Bird

Authors: John Witteman, Anthony
Pereira, Carolyn Cargnel, Pamela
Bonaparte-Golding

Disposition Date: 11/25/2008

Date Submitted: 11/14/2008

Disposition Status: Approved

Implementation Date Requested: On Approval

Implementation Date:

State Filing Description:

General Information

Project Name: P-SCH-HD7-DB(1/09)

Project Number: P-SCH-HD7-DB(1/09)

Requested Filing Mode: Review & Approval

Explanation for Combination/Other:

Submission Type: New Submission

Overall Rate Impact:

Filing Status Changed: 11/25/2008

State Status Changed: 11/25/2008

Corresponding Filing Tracking Number:

Filing Description:

VIA SERFF

Status of Filing in Domicile: Pending

Date Approved in Domicile:

Domicile Status Comments:

Market Type: Group

Group Market Size: Small and Large

Group Market Type: Discretionary

Deemer Date:

November 14, 2008

SERFF Tracking Number: PRUD-125904398 State: Arkansas
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Hon. Walter Bell
Commissioner of Insurance
Department of Insurance
201 Monroe Street, Suite 1700
Montgomery, AL 36104

Attn: Rates and Forms Division

RE: Pruco Life Insurance Company ("Pruco," "we," "us")
NAIC #79227 FEIN # 22-1944557

Forms Submitted for Approval:

Schedule Supplement Form P-SCH-HD7-LIA(1/09) For use with Rider Form P-RID-HD7-LIA(7/08). Approved on May 7, 2008 File No. PRUD-125631808

Schedule Supplement Form P-SCH-HD7-DB(1/09) For use with Rider Form P-RID-HD7-DB(7/08) Approved on May 2, 2008 File No. PRUD-125626324

Schedule Supplement Form P-SCH-HD7(1/09) For use with Rider Form P-RID-HD7(1/08) Approved on November 29, 2007 File No. PRUD-125356407

Schedule Supplement Form P-SCH-HDLT(1/09) For use with Rider Form P-RID-HDLT(1/07) Approved on March 22, 2007, File No. PRUD-125090121

Dear Reviewer:

Pruco respectfully submits the referenced forms for your approval. Once your Department approves this filing, these forms will be offered as optional benefits for any new and existing annuity business (that has received your Department's prior approval) in a non-discriminatory manner.

In addition to any new benefit election, we may allow annuity owners that have an existing benefit to elect the terms

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contained in the referenced schedule pages without canceling the guarantees provided by the existing benefit. The main difference in the referenced schedule pages and the prior approved schedule pages is the Benefit Transfer Formula is adjusted to place a 90% cap on transfers of the account value to the Benefit Transfer Account. Another difference is an "Effective Date of the 90% Cap Rule" item has been added to indicate the effective date. As in the prior approved versions, this Rider will make use of a transfer formula to monitor investment performance and move funds between the investment options selected by the annuity holder and a transfer account to mitigate the risks borne by the company associated with the optional rider's guarantees.

The annuity forms submitted are designed for use for qualified and non-qualified sales, as defined in the Internal Revenue Code. Should this Rider be used with certain qualified sales described under the Internal Revenue Code, the appropriate endorsement, approved or accepted by your Department, will be provided to the annuity holder and will be made part of the annuity to satisfy any federal qualified usage requirements.

Any brackets in the Schedule Supplements indicate that we reserve the right to change the information shown within brackets, without re-filing with your Department, based on new business requirement and any specific classifications of annuity holders to which we wish to offer these benefits. Statements of Variable Material are included with this filing to describe how variable information may change.

Please note that actuarial memorandums, and any related material, are enclosed with this submission. These actuarial memorandums are annuity product-specific. Any certifications or other materials Pruco believes you require are also enclosed. Pruco believes that federal law exempts these forms from any "Flesch score" or readability requirements in your statutes or regulations. Unless otherwise informed, Pruco

reserves the right to alter the pagination, layout, including sequential order, color, and typeface of these forms. Pruco confirms any such change will be in conformance with your State's filing requirements.

Please contact the undersigned as indicated below if you have any questions or require additional information.

Sincerely,

SERFF Tracking Number: PRUD-125904398 State: Arkansas
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Pamela Bonaparte-Golding
 Contract Specialist
 PH: (203) 944-7544
 Email: pamela.bonaparte-golding@prudential.com
 Fax: (203) 944- 7737

Enclosures

Company and Contact

Filing Contact Information

Anthony Pereira, Senior Compliance Analyst Anthony.Pereira@Prudential.com
 One Corporate Drive (800) 628-6039 [Phone]
 Shelton, CT 06484 (203) 944-7510[FAX]

Filing Company Information

Pruco Life Insurance Company CoCode: 79227 State of Domicile: Arizona
 751 Broad Street Group Code: 304 Company Type: Life
 Newark, NJ 07102-3777 Group Name: State ID Number:
 (973) 802-6000 ext. [Phone] FEIN Number: 22-1944557

Filing Fees

Fee Required? Yes
 Fee Amount: \$80.00
 Retaliatory? No
 Fee Explanation: \$20.00 per form X 4 Forms = \$80.00
 Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Pruco Life Insurance Company	\$80.00	11/14/2008	23938986

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Disposition

Disposition Date: 11/25/2008

Implementation Date:

Status: Approved

Comment:

Rate data does NOT apply to filing.

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Item Type	Item Name	Item Status	Public Access
Supporting Document	Certification/Notice		Yes
Supporting Document	Application		No
Supporting Document	Life & Annuity - Actuarial Memo		No
Supporting Document (revised)	Cover Letter		Yes
Supporting Document	Cover Letter		Yes
Supporting Document	Filing Fee Form		Yes
Form	Highest Daily Lifetime Seven With Beneficiary Income Option Benefit Schedule Supplement		Yes
Form	Highest Daily Lifetime Five Benefit Schedule Supplement		Yes
Form	Highest Daily Lifetime Seven Benefit Schedule Supplement		Yes
Form	Highest Daily Lifetime Seven with Lifetime Income Accelerator Schedule Supplement		Yes

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Amendment Letter

Amendment Date:

Submitted Date: 11/25/2008

Comments:

Ms. Bird,

This filing has been amended as the cover letter was incorrectly addressed to the Alabama Department of Insurance. Please note is is also incorrectly addressed on the General Information Tab.

Please accept my apologies for this oversight.

Thank you,

Pamela Bonaparte-Golding

Changed Items:

Supporting Document Schedule Item Changes:

User Added -Name: Cover Letter

Comment:

Cover letter PRUCO Arkansas.pdf

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Form Schedule

Lead Form Number: P-SCH-HD7-DB(1/09)

Review Status	Form Number	Form Type	Form Name	Action	Action Specific Data	Readability	Attachment
	P-SCH-HD7-DB(1/09)	Policy/Contract	Highest Daily Lifetime Seven With Beneficiary Income Certificate: Option Benefit Amendment, Insert Supplement Page, Endorsement or Rider	Initial		0	P-SCH-HD7-DB_1-09_.pdf
	P-SCH-HDLT(1/09)	Policy/Contract	Highest Daily Lifetime Five Benefit Schedule Certificate: Supplement Amendment, Insert Page, Endorsement or Rider	Initial		0	P-SCH-HDLT_1-09_.pdf
	P-SCH-HD7(1/09)	Policy/Contract	Highest Daily Lifetime Seven Benefit Schedule Certificate: Supplement Amendment, Insert Page, Endorsement or Rider	Initial		0	P-SCH-HD7_1-09_.pdf
	P-SCH-HD7-LIA(1/09)	Policy/Contract	Highest Daily Lifetime Seven with Lifetime Income Certificate: Accelerator Schedule	Initial		0	P-SCH-HD7-LIA_1-09_.pdf

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Amendmen Supplement
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Endorseme
nt or Rider

**PRUCO LIFE INSURANCE COMPANY
2999 NORTH 44TH STREET, SUITE 250
PHOENIX, ARIZONA 85014**

**HIGHEST DAILY LIFETIME SEVEN WITH BENEFICIARY INCOME OPTION BENEFIT
SCHEDULE SUPPLEMENT**

ANNUITY NUMBER:

EFFECTIVE DATE:

EFFECTIVE DATE OF [90%] CAP RULE: [Issue Date of Schedule Supplement]

SPOUSAL DESIGNATED LIFE/LIVES:

DATE OF BIRTH:

DATE OF BIRTH:

ROLL-UP RATE: 7.0% per year

ANNUAL INCOME PERCENTAGE:

Attained Age of Single Designated Life	Annual Income Percentage	Attained Age of Younger Spousal Designated Life	Annual Income Percentage
Less than 75	5%	Less than 80	5%
75 - 79	6%	80 - 84	6%
80 - 84	7%	85 - 89	7%
85 or more	8%	90 or more	8%

MINIMUM GUARANTEE PAYMENT: \$100

PERIODIC VALUE CUT-OFF DATE: The Tenth Anniversary of the Effective Date

TRANSFER ACCOUNT: AST Investment Grade Bond Portfolio. If this portfolio is discontinued, we will substitute a successor portfolio, if there is one. Otherwise, we will substitute a comparable portfolio. We will obtain any required regulatory approvals prior to substitution of the portfolio.

CHARGE FOR THE RIDER: You have elected this Rider on a _____ basis. You have elected this Rider the Beneficiary Income Option. Therefore the charge for the Rider is an annual rate of ____ %.

ANNUITY PAYMENT TABLE: The Annuity Payment Table below is used to compute the minimum annual amount of a single life annuity payment with 10 payments certain per \$1,000 applied. We used the Annuity 2000 Valuation Mortality Table, less two years, with projected mortality improvements (modified scale G), with an interest rate of 3% per year in preparing the Annuity Payment Table.

Single Life Annuity Payment with 10 Payments Certain

Age	Male	Female	Age	Male	Female
55	48.68	45.60	80	87.48	83.01
60	53.45	49.71	85	97.52	94.84
65	59.66	55.11	90	105.41	104.20
70	67.55	62.27	95	110.53	109.94
75	77.02	71.62			

**HIGHEST DAILY LIFETIME SEVEN WITH BENEFICIARY INCOME OPTION BENEFIT
SCHEDULE SUPPLEMENT (CONTINUED)**

The Annuity Payment Table below is used to compute the minimum annual amount of a joint and last survivor life annuity payment with 10 payments certain per \$1,000 applied. We used Annuity 2000 Valuation Mortality Table, less two years, with projected mortality improvements (modified scale G), and an interest rate of 3% per year in preparing the Annuity Payment Table.

Joint and Last Survivor Life Annuity Payment with 10 Payments Certain

		Female Age								
		55	60	65	70	75	80	85	90	95
Male Age:	55	42.00	43.62	45.09	46.32	47.26	47.92	48.33	48.54	48.63
	60	43.07	45.24	47.37	49.31	50.90	52.06	52.79	53.18	53.36
	65	43.93	46.65	49.56	52.43	55.01	57.03	58.39	59.14	59.48
	70	44.57	47.77	51.45	55.41	59.32	62.69	65.11	66.52	67.20
	75	45.00	48.58	52.91	57.94	63.37	68.52	72.56	75.07	76.33
	80	45.29	49.11	53.92	59.84	66.72	73.86	79.99	84.06	86.23
	85	45.45	49.42	54.54	61.07	69.10	78.04	86.32	92.22	95.52
	90	45.54	49.59	54.88	61.76	70.52	80.75	90.76	98.26	102.64
	95	45.58	49.67	55.04	62.10	71.25	82.23	93.36	101.97	107.14

For purposes of determining annuity payments using the above Annuity Payment Tables, we use the Annuitant's(s') Adjusted Age and Sex. The Adjusted Age is the age last birthday prior to the date on which the first Annuity Payment is due, adjusted as shown in the "Translation of Adjusted Age Table" below.

Translation of Adjusted Age Table

Calendar Year in Which First Payment is Due	Adjusted Age	Calendar Year in Which First Payment is Due	Adjusted Age
Prior to 2010	Actual Age	2050 through 2059	Actual Age minus 5
2010 through 2019	Actual Age minus 1	2060 through 2069	Actual Age minus 6
2020 through 2029	Actual Age minus 2	2070 through 2079	Actual Age minus 7
2030 through 2039	Actual Age minus 3	2080 through 2089	Actual Age minus 8
2040 through 2049	Actual Age minus 4	2090 through 2099	Actual Age minus 9

**HIGHEST DAILY LIFETIME SEVEN WITH BENEFICIARY INCOME OPTION BENEFIT
SCHEDULE SUPPLEMENT (CONTINUED)**

TRANSFER CALCULATION FORMULA

The following are the Terms and Definitions referenced in the Transfer Calculation

Formula:

- o C_u the upper target is established on the Effective Date and is not changed for the life of the guarantee.
- o C_t the target is established on the Effective Date and is not changed for the life of the guarantee.
- o C_l the lower target is established on the Effective Date and is not changed for the life of the guarantee.
- o L the target value as of the current Valuation Day.
- o r the target ratio.
- o a the factors used in calculating the target value. These factors are established on the Effective Date and are not changed for the life of the guarantee.
- o V_V the total value of all elected Sub-accounts in the Annuity.
- o V_F the total value of all elected Fixed Rate Options in the Annuity
- o B the total value of all Transfer Account allocations.
- o P the Income Basis. Prior to the first withdrawal, the Income Basis is equal to the Protected Withdrawal Value calculated as if the first withdrawal were taken on the date of calculation. After the first withdrawal, the Income Basis equals the greatest of (1) the Account Value on the date of calculation; (2) the Protected Withdrawal Value on the date of the first withdrawal after the Effective Date, increased for subsequent additional Adjusted Purchase Payments and adjusted proportionally for Excess Income; or (3) the highest quarterly Account Value prior to the date of calculation.
- o T the amount of a transfer into or out of the Transfer Account.

Target Value Calculation:

On each Valuation Day, a target value (L) is calculated, according to the following formula. Target values are subject to change for new elections of the Rider on a going-forward basis.

$$L = 0.05 * P * a$$

Transfer Calculation:

The following formula, which is set on the Effective Date of the 90% Cap Rule as shown in this Schedule Supplement and is not changed for the life of the guarantee, determines when a transfer is required. On the Effective Date of the 90% Cap Rule (and only on this date), the following asset transfer calculation is performed to determine the amount of Account Value allocated to the Transfer Account:

$$\text{If } (B / (V_V + V_F + B) > .90) \text{ then} \\ T = B - [(V_V + V_F + B) * .90]$$

If T is greater than \$0 as described above, then no additional transfer calculations are performed on the Effective Date of the 90% Cap Rule.

On each Valuation Day thereafter (including the Effective Date of the 90% Cap Rule, provided $B / (V_V + V_F + B) \leq .90$), the following asset transfer calculation is performed:

$$\text{Target Ratio } r = (L - B) / (V_V + V_F)$$

If $r > C_u$, assets in the elected Sub-accounts are transferred to the Transfer Account, provided transfers are not suspended under the 90% Cap Rule described below.

If $r < C_l$ and there are currently assets in the Transfer Account ($B > 0$), assets in the Transfer Account are transferred to the elected Sub-accounts according to most recent allocation instructions.

The following formula, which is set on the Effective Date of the 90% Cap Rule and is not changed for the life of the guarantee, determines the transfer amount:

$T = \text{Min} (\text{MAX} (0, (0.90 * (V_V + V_F + B)) - B), [L - B - (V_V + V_F) * C_l] / (1 - C_l))$ Money is transferred from the elected Sub-accounts to Transfer Account.

$T = \{\text{Min} (B, -[L - B - (V_V + V_F) * C_l] / (1 - C_l))\}$ Money is transferred from the Transfer Account to the elected Sub-accounts.

At any given time, some, most, or none of the Account Value may be allocated to the Transfer Account under the Transfer Calculation formula.

90% Cap Rule: If, on any Valuation Day, on and after the Effective Date of the 90% Cap Rule, a transfer occurs which results in 90% of the Account Value being allocated to the Transfer Account, any transfers into the Transfer Account will be suspended, even if the formula would otherwise dictate that a transfer into the Transfer Account should occur. Transfers out of the Transfer Account and into the elected Sub-accounts will still be allowed. The suspension will be lifted once a transfer out of the Transfer Account occurs. Due to the performance of the Transfer Account and the elected Sub-Accounts, the Account Value could be more than 90% invested in the Transfer Account.]

**PRUCO LIFE INSURANCE COMPANY
(A Prudential Financial Company)
2999 NORTH 44th STREET, SUITE 250
PHOENIX, ARIZONA 85014**

**HIGHEST DAILY LIFETIME FIVE BENEFIT
SCHEDULE SUPPLEMENT**

ANNUITY NUMBER: [XXXXXXXX]

EFFECTIVE DATE OF THE RIDER: [FEBRUARY 15, 2007]

EFFECTIVE DATE OF [90%] CAP RULE: [Issue Date of Schedule Supplement]

[[SPOUSAL] DESIGNATED LIFE/LIVES]:

[JOHN DOE] DATE OF BIRTH: [FEBRUARY 21, 1955]
[[MARY DOE] DATE OF BIRTH: [JANUARY 1, 1956]]

ROLL-UP RATE: [5.0% per year]

ANNUAL INCOME PERCENTAGE: [[5.0%]

[The Annual Income Amount is determined at the time of the first withdrawal after the Effective Date and on a Designated Life's age at the time of the first withdrawal. It is equal to an Annual Income Percentage, as shown below, applied against the Protected Withdrawal Value. For Spousal Designated Lives, the percentage is based on the youngest Designated Life's age at the time of the first withdrawal.

Age of Designated Life	Annual Income Percentage Applied Against Protected Withdrawal Value
50 – 64	4%
65 – 74	5%
75 – 84	6%
85+	7%

]]

MINIMUM GUARANTEED PAYMENT: [\$100]

CHARGE FOR THE RIDER: [THE DAILY EQUIVALENT OF AN ANNUAL RATE APPLIED TO SUB-ACCOUNTS:

[FOR SINGLE DESIGNATED LIFE: [0.60]%;
[FOR SPOUSAL DESIGNATED LIVES: [0.75]%;

INTEREST RATE MINIMUM: [[2.0]% ANNUALLY FOR CREDITING PERIODS THAT START PRIOR TO THE [TENTH] ANNIVERSARY OF THE [ANNUITY'S ISSUE DATE/CONTRACT DATE]; [3.0]% ANNUALLY FOR CREDITING PERIODS THAT START ON OR AFTER THE [TENTH] ANNIVERSARY OF THE [ANNUITY'S ISSUE DATE/CONTRACT DATE]]

**HIGHEST DAILY LIFETIME FIVE BENEFIT
SCHEDULE SUPPLEMENT (CONTINUED)**

Annuity Payment Table: The Annuity Payment Table below is used to compute the minimum annual amount of a single life annuity payment with 10 payments certain per \$1,000 applied. We used the Annuity 2000 Valuation Mortality Table, less two years, with projected mortality improvements (modified scale G), with an interest rate of [3]% per year in preparing the Annuity Payment Table.

Single Life Annuity Payment with 10 Payments Certain

AGE	Male	Female	AGE	Male	Female
55	48.68	45.60	80	87.48	83.01
60	53.45	49.71	85	97.52	94.84
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70	67.55	62.27	95	110.53	109.94
75	77.02	71.62			

The Annuity Payment Table below is used to compute the minimum annual amount of a joint and last survivor life annuity payment with 10 payments certain per \$1,000 applied. We used Annuity 2000 Valuation Mortality Table, less two years, with projected mortality improvements (modified scale G), and an interest rate of [3]% per year in preparing the Annuity Payment Table.

Joint and Last Survivor Life Annuity Payment with 10 Payments Certain

Female Age

		55	60	65	70	75	80	85	90	95
Male Age:	55	42.00	43.62	45.09	46.32	47.26	47.92	48.33	48.54	48.63
	60	43.07	45.24	47.37	49.31	50.90	52.06	52.79	53.18	53.36
	65	43.93	46.65	49.56	52.43	55.01	57.03	58.39	59.14	59.48
	70	44.57	47.77	51.45	55.41	59.32	62.69	65.11	66.52	67.20
	75	45.00	48.58	52.91	57.94	63.37	68.52	72.56	75.07	76.33
	80	45.29	49.11	53.92	59.84	66.72	73.86	79.99	84.06	86.23
	85	45.45	49.42	54.54	61.07	69.10	78.04	86.32	92.22	95.52
	90	45.54	49.59	54.88	61.76	70.52	80.75	90.76	98.26	102.64
	95	45.58	49.67	55.04	62.10	71.25	82.23	93.36	101.97	107.14

**HIGHEST DAILY LIFETIME FIVE BENEFIT
SCHEDULE SUPPLEMENT (CONTINUED)**

The factors in the Annuity Payment Tables are based on the Annuitant's(s') Adjusted Age and Sex. The Adjusted Age is the age last birthday prior to the date on which the first Annuity Payment is due, adjusted as shown in the "Translation of Adjusted Age Table" below.

Translation of Adjusted Age Table

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2040 through 2049	Actual Age minus 4	2090 through 2099	Actual Age minus 9]

ADDITIONAL INFORMATION ABOUT TRANSFERS BETWEEN THE SUB-ACCOUNTS AND THE BENEFIT FIXED RATE ACCOUNT

[The program described in the Rider monitors your Account Value daily, and, as determined by the formula set forth below, transfers are made between the Sub-accounts and the Benefit Fixed Rate Account. At any given time, some, most, or none of the Account Value may be allocated to the Benefit Fixed Rate Account under the formula.

Any transfers out of the Sub-accounts into the Benefit Fixed Rate Account are made on a pro rata basis. Any transfers out of the Benefit Fixed Rate Account are taken out of the Benefit Fixed Rate Account on a last-in, first-out basis. Such transfer amounts are deposited into the Sub-accounts on a pro rata basis, unless you instruct us otherwise.

Terms and Definitions referenced in the calculation formula:

- o C_u – the upper target is established on the Effective Date and is not changed for the life of the guarantee.
- o C_t – the target is established on the Effective Date and is not changed for the life of the guarantee.
- o C_l – the lower target is established on the Effective Date and is not changed for the life of the guarantee.
- o L – the target value as of the current Valuation Day.
- o r – the target ratio.
- o a – the factors used in calculating the target value. These factors are established on the Effective Date and are not changed for the life of the guarantee.
- o Q – age based factors used in calculating the target value. These factors are established on the Effective Date and are not changed for the life of the guarantee.
- o V – the total value of all Sub-accounts in the Annuity.
- o F – the total value of all Benefit Fixed Rate Account allocations.
- o I – the Income Value prior to the first withdrawal. The Income Value is equal to what the Annual Income Amount would be if the first withdrawal were taken on the date of calculation. After the first withdrawal the Income Value equals the greater of the Annual Income Amount, the quarterly step-up amount times the Annual Income Percentage, and the Account Value times the Annual Income Percentage.
- o T – the amount of a transfer into or out of the Benefit Fixed Rate Account.
- o $I\%$ – Annual Income Amount percentage. This factor is established on the Effective Date and is not changed for the life of the guarantee.

**HIGHEST DAILY LIFETIME FIVE BENEFIT
SCHEDULE SUPPLEMENT (CONTINUED)**

Target Value Calculation:

On each Valuation Day, a target value (L) is calculated, according to the following formula.

$$L = I * Q * a$$

Transfer Calculation:

The following formula, which is set on the Effective Date of the 90% Cap Rule as shown in this Schedule Supplement and is not changed for the life of the guarantee, determines when a transfer is required. On the Effective Date of the 90% Cap Rule (and only on this date), the following asset transfer calculation is performed to determine the amount of Account Value allocated to the Benefit Fixed Rate Account:

$$\text{If } (F/(V + F) > .90) \text{ then} \\ T = F - [(V + F) * .90]$$

If T is greater than \$0 as described above, then no additional transfer calculations are performed on the Effective Date of the 90% Cap Rule.

On each Valuation Day thereafter (including the Effective Date of the 90% Cap Rule, provided $F/(V+F) \leq .90$), the following asset transfer calculation is performed

$$\text{Target Ratio } r = (L - F)/V$$

. If $r > C_u$, assets in the elected Sub-accounts are transferred to the Benefit Fixed Rate Account, provided transfers are not suspended under the 90% Cap Rule described below.

. If $r < C_l$ and there are currently assets in the Benefit Fixed Rate Account ($F > 0$), assets in the Benefit Fixed Rate Account are transferred to the elected Sub-accounts.

The following formula, which is set on the Effective Date of the 90% Cap Rule and is not changed for the life of the guarantee, determines the transfer amount:

$$T = \text{Min} (\text{MAX} (0, (0.90 * (V+F)) - F), [L - F - V * C_l] / (1 - C_l)) \quad \text{Money is transferred from the elected Sub-accounts to Benefit Fixed Rate Account}$$

$$T = \{\text{Min} (F, -[L - F - V * C_l] / (1 - C_l))\} \quad \text{Money is transferred from the Benefit Fixed Rate Account to the elected Sub-accounts.}$$

90% Cap Rule: If, on any Valuation Day, on and after the Effective Date of the 90% Cap Rule, a transfer occurs which results in 90% of the Account Value being allocated to the Benefit Fixed Rate Account, any transfers into the Benefit Fixed Rate Account will be suspended, even if the formula would otherwise dictate that a transfer into the Benefit Fixed Rate Account should occur. Transfers out of the Benefit Fixed Rate Account and into the elected Sub-accounts will still be allowed. The suspension will be lifted once a transfer out of the Benefit Fixed Rate Account occurs. Due to the performance of the Benefit Fixed Rate Account and the elected Sub-Accounts, the Account Value could be more than 90% invested in the Benefit Fixed Rate Account.]

**PRUCO LIFE INSURANCE COMPANY
[2999 NORTH 44TH STREET, SUITE 250
PHOENIX, ARIZONA 85014]**

**[HIGHEST DAILY LIFETIME SEVEN] BENEFIT
SCHEDULE SUPPLEMENT**

ANNUITY NUMBER: [001-0001]

EFFECTIVE DATE: [Issue Date of the Annuity]

EFFECTIVE DATE OF [90%] CAP RULE: [Issue Date of Schedule Supplement]

[[SPOUSAL] DESIGNATED LIFE/LIVES]:

[John Doe]
[[Mary Doe]

DATE OF BIRTH: [February 21, 1945]
DATE OF BIRTH: [January 1, 1946]

ROLL-UP RATE: [7.0% per year]

ANNUAL INCOME PERCENTAGE:

[Attained Age of Single Designated Life	Annual Income Percentage	Attained Age of Younger Spousal Designated Life	Annual Income Percentage
Less than 75	5%	Less than 80	5%
75 - 79	6%	80 - 84	6%
80 - 84	7%	85 - 89	7%
85 or more	8%	90 or more	8%

MINIMUM GUARANTEE PAYMENT: [\$100]

TRANSFER ACCOUNT: [AST Investment Grade Bond Portfolio]. If this portfolio is discontinued, we will substitute a successor portfolio, if there is one. Otherwise, we will substitute a comparable portfolio. We will obtain any required regulatory approvals prior to substitution of the portfolio.

CHARGE FOR THE RIDER: [You have elected this Rider on a [Single Designated Life] basis. Therefore the charge for the Rider is an annual rate of [0.60]%].

ANNUITY PAYMENT TABLE: [The Annuity Payment Table below is used to compute the minimum annual amount of a single life annuity payment with 10 payments certain per \$1,000 applied. We used the Annuity 2000 Valuation Mortality Table, less two years, with projected mortality improvements (modified scale G), with an interest rate of [3]% per year in preparing the Annuity Payment Table.

Single Life Annuity Payment with 10 Payments Certain

Age	Male	Female	Age	Male	Female
55	48.68	45.60	80	87.48	83.01
60	53.45	49.71	85	97.52	94.84
65	59.66	55.11	90	105.41	104.20
70	67.55	62.27	95	110.53	109.94
75	77.02	71.62			

**[HIGHEST DAILY LIFETIME SEVEN] BENEFIT
SCHEDULE SUPPLEMENT (CONTINUED)**

The Annuity Payment Table below is used to compute the minimum annual amount of a joint and last survivor life annuity payment with 10 payments certain per \$1,000 applied. We used Annuity 2000 Valuation Mortality Table, less two years, with projected mortality improvements (modified scale G), and an interest rate of [3] % per year in preparing the Annuity Payment Table.

Joint and Last Survivor Life Annuity Payment with 10 Payments Certain

		Female Age								
		55	60	65	70	75	80	85	90	95
Male Age:	55	42.00	43.62	45.09	46.32	47.26	47.92	48.33	48.54	48.63
	60	43.07	45.24	47.37	49.31	50.90	52.06	52.79	53.18	53.36
	65	43.93	46.65	49.56	52.43	55.01	57.03	58.39	59.14	59.48
	70	44.57	47.77	51.45	55.41	59.32	62.69	65.11	66.52	67.20
	75	45.00	48.58	52.91	57.94	63.37	68.52	72.56	75.07	76.33
	80	45.29	49.11	53.92	59.84	66.72	73.86	79.99	84.06	86.23
	85	45.45	49.42	54.54	61.07	69.10	78.04	86.32	92.22	95.52
	90	45.54	49.59	54.88	61.76	70.52	80.75	90.76	98.26	102.64
	95	45.58	49.67	55.04	62.10	71.25	82.23	93.36	101.97	107.14

For purposes of determining annuity payments using the above Annuity Payment Tables, we use the Annuitant's(s') Adjusted Age and Sex. The Adjusted Age is the age last birthday prior to the date on which the first Annuity Payment is due, adjusted as shown in the "Translation of Adjusted Age Table" below.

Translation of Adjusted Age Table

Calendar Year in Which First Payment is Due	Adjusted Age	Calendar Year in Which First Payment is Due	Adjusted Age
Prior to 2010	Actual Age	2050 through 2059	Actual Age minus 5
2010 through 2019	Actual Age minus 1	2060 through 2069	Actual Age minus 6
2020 through 2029	Actual Age minus 2	2070 through 2079	Actual Age minus 7
2030 through 2039	Actual Age minus 3	2080 through 2089	Actual Age minus 8
2040 through 2049	Actual Age minus 4	2090 through 2099	Actual Age minus 9]

**[HIGHEST DAILY LIFETIME SEVEN] BENEFIT
SCHEDULE SUPPLEMENT (CONTINUED)**

TRANSFER CALCULATION FORMULA

The following are the Terms and Definitions referenced in the Transfer Calculation

Formula:

- o C_u the upper target is established on the Effective Date and is not changed for the life of the guarantee.
- o C_t the target is established on the Effective Date and is not changed for the life of the guarantee.
- o C_l the lower target is established on the Effective Date and is not changed for the life of the guarantee.
- o L the target value as of the current Valuation Day.
- o r the target ratio.
- o a the factors used in calculating the target value. These factors are established on the Effective Date and are not changed for the life of the guarantee.
- o V the total value of all elected Sub-accounts in the Annuity.
- o B the total value of all Transfer Account allocations.
- o P the Income Basis. Prior to the first withdrawal, the Income Basis is equal to the Protected Withdrawal Value calculated as if the first withdrawal were taken on the date of calculation. After the first withdrawal, the Income Basis equals the greatest of (1) the Account Value on the date of calculation; (2) the Protected Withdrawal Value on the date of the first withdrawal after the Effective Date, increased for subsequent additional Adjusted Purchase Payments and adjusted proportionally for Excess Income; or (3) the highest quarterly Account Value prior to the date of calculation.
- o T the amount of a transfer into or out of the Transfer Account.

Target Value Calculation:

On each Valuation Day, a target value (L) is calculated, according to the following formula. Target values are subject to change for new elections of the Rider on a going-forward basis.

$$L = 0.05 * P * a$$

Transfer Calculation:

The following formula, which is set on the Effective Date of the 90% Cap Rule as shown in this Schedule Supplement and is not changed for the life of the guarantee, determines when a transfer is required. On the Effective Date of the 90% Cap Rule (and only on this date), the following asset transfer calculation is performed to determine the amount of Account Value allocated to the Transfer Account:

$$\text{If } (B/(V + B) > .90) \text{ then} \\ T = B - [(V + B) * .90]$$

If T is greater than \$0 as described above, then no additional transfer calculations are performed on the Effective Date of the 90% Cap Rule.

On each Valuation Day thereafter (including the Effective Date of the 90% Cap Rule, provided $B/(V+B) \leq .90$), the following asset transfer calculation is performed:

$$\text{Target Ratio } r = (L - B)/V$$

. If $r > C_u$, assets in the elected Sub-accounts are transferred to the Transfer Account provided transfers are not suspended under the 90% Cap Rule described below.

. If $r < C_t$ and there are currently assets in the Transfer Account ($B > 0$), assets in the Transfer Account are transferred to the elected Sub-accounts according to most recent allocation instructions.

The following formula, which is set on the Effective Date of the 90% Cap Rule and is not changed for the life of the guarantee, determines the transfer amount:

$T = \text{Min} (\text{MAX} (0, (0.90 * (V+B)) - B), [L - B - V * C_t] / (1 - C_t))$ Money is transferred from the elected Sub-accounts to Transfer Account

$T = \{\text{Min} (B, -[L - B - V * C_t] / (1 - C_t))\}$ Money is transferred from the Transfer Account to the elected Sub-accounts.

At any given time, some, most, or none of the Account Value may be allocated to the Transfer Account under the Transfer Calculation formula.

90% Cap Rule: If, on any Valuation Day, on and after the Effective Date of the 90% Cap Rule, a transfer occurs which results in 90% of the Account Value being allocated to the Transfer Account, any transfers into the Transfer Account will be suspended, even if the formula would otherwise dictate that a transfer into the Transfer Account should occur. Transfers out of the Transfer Account and into the elected Sub-accounts will still be allowed. The suspension will be lifted once a transfer out of the Transfer Account occurs. Due to the performance of the Transfer Account and the elected Sub-Accounts, the Account Value could be more than 90% invested in the Transfer Account.]

**PRUCO LIFE INSURANCE COMPANY
2999 NORTH 44TH STREET, SUITE 250
PHOENIX, ARIZONA 85014**

**HIGHEST DAILY LIFETIME SEVEN WITH LIFETIME INCOME ACCELERATOR
SCHEDULE SUPPLEMENT**

ANNUITY NUMBER:

EFFECTIVE DATE:

EFFECTIVE DATE OF [90%] CAP RULE: [Issue Date of Schedule Supplement]

DESIGNATED LIFE:

DATE OF BIRTH:

ROLL-UP RATE: 7.0% per year

PERIODIC VALUE CUT-OFF DATE: THE TENTH ANNIVERSARY DATE

ANNUAL INCOME PERCENTAGE:

Attained Age of Single Designated Life	Annual Income Percentage
Less than 75	5%
75 - 79	6%
80 - 84	7%
85 or more	8%

MINIMUM GUARANTEE PAYMENT: \$100

TRANSFER ACCOUNT: AST Investment Grade Bond Portfolio. If this portfolio is discontinued, we will substitute a successor portfolio, if there is one. Otherwise, we will substitute a comparable portfolio. We will obtain any required regulatory approvals prior to substitution of the portfolio.

CHARGE FOR THE RIDER: annual rate of 0.95% of the Protected Withdrawal Value.

WAITING PERIOD: 36 Months from Effective Date

ELIMINATION PERIOD: 120 Days from receipt of request for eligibility for increased guaranteed minimum payments

MULTIPLIER FOR LIA: 2

LIA LIMITATION: NOT APPLICABLE

ANNUITY PAYMENT TABLE: The Annuity Payment Table below is used to compute the minimum annual amount of a single life annuity payment with 10 payments certain per \$1,000 applied. We used the Annuity 2000 Valuation Mortality Table, less two years, with projected mortality improvements (modified scale G), with an interest rate of 3% per year in preparing the Annuity Payment Table.

**HIGHEST DAILY LIFETIME SEVEN WITH LIFETIME INCOME ACCELERATOR
SCHEDULE SUPPLEMENT (CONTINUED)**

Single Life Annuity Payment with 10 Payments Certain

Age	Male	Female	Age	Male	Female
55	48.68	45.60	80	87.48	83.01
60	53.45	49.71	85	97.52	94.84
65	59.66	55.11	90	105.41	104.20
70	67.55	62.27	95	110.53	109.94
75	77.02	71.62			

For purposes of determining annuity payments using the above Annuity Payment Table, we use the Annuitant's(s') Adjusted Age and Sex. The Adjusted Age is the age last birthday prior to the date on which the first Annuity Payment is due, adjusted as shown in the "Translation of Adjusted Age Table" below.

Translation of Adjusted Age Table

Calendar Year in Which First Payment is Due	Adjusted Age	Calendar Year in Which First Payment is Due	Adjusted Age
Prior to 2010	Actual Age	2050 through 2059	Actual Age minus 5
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2040 through 2049	Actual Age minus 4	2090 through 2099	Actual Age minus 9

TRANSFER CALCULATION FORMULA

The following are the Terms and Definitions referenced in the Transfer Calculation Formula:

- o C_u the upper target is established on the Effective Date and is not changed for the life of the guarantee.
- o C_t the target is established on the Effective Date and is not changed for the life of the guarantee.
- o C_l the lower target is established on the Effective Date and is not changed for the life of the guarantee.
- o L the target value as of the current Valuation Day.
- o r the target ratio.
- o a the factors used in calculating the target value. These factors are established on the Effective Date and are not changed for the life of the guarantee.
- o V_v the total value of all elected Sub-accounts in the Annuity.
- o V_f the total value of all elected Fixed Rate Options in the Annuity
- o B the total value of all Transfer Account allocations.
- o P the Income Basis. Prior to the first withdrawal, the Income Basis is equal to the Protected Withdrawal Value calculated as if the first withdrawal were taken on the date of calculation. After the first withdrawal, the Income Basis equals the greatest of (1) the Account Value on the date of calculation; (2) the Protected Withdrawal Value on the date of the first withdrawal after the Effective Date, increased for subsequent additional Adjusted Purchase Payments and adjusted proportionally for Excess Income; or (3) the highest quarterly Account Value prior to the date of calculation.

- o T the amount of a transfer into or out of the Transfer Account.

**HIGHEST DAILY LIFETIME SEVEN WITH LIFETIME INCOME ACCELERATOR
SCHEDULE SUPPLEMENT (CONTINUED)**

Target Value Calculation:

On each Valuation Day, a target value (L) is calculated, according to the following formula. Target values are subject to change for new elections of the Rider on a going-forward basis.

$$L = 0.05 * P * a$$

Transfer Calculation:

The following formula, which is set on the Effective Date of the 90% Cap Rule as shown in this Schedule Supplement and is not changed for the life of the guarantee, determines when a transfer is required. On the Effective Date of the 90% Cap Rule (and only on this date), the following asset transfer calculation is performed to determine the amount of Account Value allocated to the Transfer Account:

$$\text{If } (B / (V_V + V_F + B)) > .90 \text{ then} \\ T = B - [(V_V + V_F + B) * .90]$$

If T is greater than \$0 as described above, then no additional transfer calculations are performed on the Effective Date of the 90% Cap Rule.

On each Valuation Day thereafter (including the Effective Date of the 90% Cap Rule, provided $B / (V_V + V_F + B) \leq .90$), the following asset transfer calculation is performed:

$$\text{Target Ratio } r = (L - B) / (V_V + V_F)$$

- . If $r > C_u$, assets in the elected Sub-accounts are transferred to the Transfer Account provided transfers are not suspended under the 90% Cap Rule described below.

- . If $r < C_l$ and there are currently assets in the Transfer Account ($B > 0$), assets in the Transfer Account are transferred to the elected Sub-accounts according to most recent allocation instructions.

The following formula, which is set on the Effective Date of the 90% Cap Rule and is not changed for the life of the guarantee, determines the transfer amount:

$$T = \text{Min} (\text{MAX} (0, (0.90 * (V_V + V_F + B)) - B), [L - B - (V_V + V_F) * C_l] / (1 - C_l)) \quad \text{Money is transferred from the elected Sub-accounts to Transfer Account.}$$

$$T = \{\text{Min} (B, -[L - B - (V_V + V_F) * C_l] / (1 - C_l))\} \quad \text{Money is transferred from the Transfer Account to the elected Sub-accounts.}$$

At any given time, some, most, or none of the Account Value may be allocated to the Transfer Account under the Transfer Calculation formula.

90% Cap Rule: If, on any Valuation Day, on and after the Effective Date of the 90% Cap Rule, a transfer occurs which results in 90% of the Account Value being allocated to the Transfer Account, any transfers into the Transfer Account will be suspended, even if the formula would otherwise dictate that a transfer into the Transfer Account should occur. Transfers out of the Transfer Account and into the elected Sub-accounts will still be allowed. The suspension will be lifted once a transfer out of the Transfer Account occurs. Due to the performance of the Transfer Account and the elected Sub-Accounts, the Account Value could be more than 90% invested in the Transfer Account.]

SERFF Tracking Number: PRUD-125904398 *State:* Arkansas
Filing Company: Pruco Life Insurance Company *State Tracking Number:* 40927
Company Tracking Number: P-SCH-HD7-DB(1/09)
TOI: A02.1G Group Annuities - Deferred Non- *Sub-TOI:* A02.1G.002 Flexible Premium
Variable and Variable
Product Name: P-SCH-HD7-DB(1/09)
Project Name/Number: P-SCH-HD7-DB(1/09)/P-SCH-HD7-DB(1/09)

Rate Information

Rate data does NOT apply to filing.

SERFF Tracking Number: PRUD-125904398 State: Arkansas
Filing Company: Pruco Life Insurance Company State Tracking Number: 40927
Company Tracking Number: P-SCH-HD7-DB(1/09)
TOI: A02.1G Group Annuities - Deferred Non- Sub-TOI: A02.1G.002 Flexible Premium
Variable and Variable
Product Name: P-SCH-HD7-DB(1/09)
Project Name/Number: P-SCH-HD7-DB(1/09)/P-SCH-HD7-DB(1/09)

Supporting Document Schedules

Review Status:
Satisfied -Name: Certification/Notice 11/14/2008
Comments:
Attachment:
AR - 7._PRU.pdf

Review Status:
Satisfied -Name: Cover Letter 11/25/2008
Comments:
Attachment:
Cover letter PRUCO Arkansas.pdf

Review Status:
Satisfied -Name: Filing Fee Form 11/14/2008
Comments:
Attachment:
AR - 7a PRU.pdf

**Pruco Life Insurance Company
751 Broad Street, Plaza Building
Newark, NJ 07102**

STATE OF ARKANSAS

CERTIFICATION OF COMPLIANCE

I hereby certify that Pruco Life Insurance Company complies with the requirements of Rules and Regulation #34 of the Arkansas Insurance Department regarding our Form Numbers:

**P-SCH-HD7-DB(1/09)
P-SCH-HDLT(1/09)
P-SCH-HD7(1/09)
P-SCH-HD7-LIA(1/09)**



Suzanne Hurel – VP, Contracts

November 14, 2008

Date



Prudential Annuities
A Business of Prudential Financial, Inc.
1 Corporate Dr
Shelton, CT 06484
(800) 752-6342

VIA SERFF

November 25, 2008

Honorable Julia Benafield Bowman, Insurance Commissioner
Life and Health Division
Arkansas Insurance Department
1200 West Third Street
Little Rock, AR 72201

Attn: Linda Bird

RE: Pruco Life Insurance Company ("Pruco," "we," "us")
NAIC #79227 FEIN # 22-1944557

Forms Submitted for Approval:

Schedule Supplement Form P-SCH-HD7-LIA(1/09) For use with Rider Form P-RID-HD7-LIA(7/08).
Approved on May 7, 2008 File No. PRUD-125631808

Schedule Supplement Form P-SCH-HD7-DB(1/09) For use with Rider Form P-RID-HD7-DB(7/08)
Approved on May 2, 2008 File No. PRUD-125626324

Schedule Supplement Form P-SCH-HD7(1/09) For use with Rider Form P-RID-HD7(1/08)
Approved on November 29, 2007 File No. PRUD-125356407

Schedule Supplement Form P-SCH-HDLT(1/09) For use with Rider Form P-RID-HDLT(1/07)
Approved on March 22, 2007, File No. PRUD-125090121

Dear Ms. Bird:

Pruco respectfully submits the referenced forms for your approval. Once your Department approves this filing, these forms will be offered as optional benefits for any new and existing annuity business (that has received your Department's prior approval) in a non-discriminatory manner.

In addition to any new benefit election, we may allow annuity owners that have an existing benefit to elect the terms contained in the referenced schedule pages without canceling the guarantees provided by the existing benefit. The main difference in the referenced schedule pages and the prior approved schedule pages is the Benefit Transfer Formula is adjusted to place a 90% cap on transfers of the account value to the Benefit Transfer Account. Another difference is an "Effective Date of the 90% Cap Rule" item has been added to indicate the effective date. As in the prior approved versions, this Rider will make use of a transfer formula to monitor investment performance and move funds between the investment options selected by the annuity holder and a transfer account to mitigate the risks borne by the company associated with the optional rider's guarantees.

The annuity forms submitted are designed for use for qualified and non-qualified sales, as defined in the Internal Revenue Code. Should this Rider be used with certain qualified sales described under the Internal Revenue Code, the appropriate endorsement, approved or accepted by your Department, will be provided to the annuity holder and will be made part of the annuity to satisfy any federal qualified usage requirements.

Any brackets in the Schedule Supplements indicate that we reserve the right to change the information shown within brackets, without re-filing with your Department, based on new business requirement and any specific classifications of annuity holders to which we wish to offer these benefits. Statements of Variable Material are included with this filing to describe how variable information may change.

Please note that actuarial memorandums, and any related material, are enclosed with this submission. These actuarial memorandums are annuity product-specific. Any certifications or other materials Pruco

November 14, 2008

Page 2

believes you require are also enclosed. Pruco believes that federal law exempts these forms from any "Flesch score" or readability requirements in your statutes or regulations. Unless otherwise informed, Pruco

reserves the right to alter the pagination, layout, including sequential order, color, and typeface of these forms. Pruco confirms any such change will be in conformance with your State's filing requirements.

Please contact the undersigned as indicated below if you have any questions or require additional information.

Sincerely,



Pamela Bonaparte-Golding

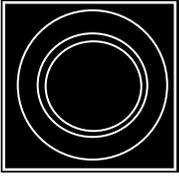
Contract Specialist

PH: (203) 944-7544

Email: pamela.bonaparte-golding@prudential.com

Fax: (203) 944- 7737

Enclosures



**ARKANSAS
INSURANCE
DEPARTMENT**

400 University Tower Building
1123 South University Ave.
Little Rock, Arkansas 72204

Lee Douglass
Insurance Commissioner

501-686-2900

ATTN: LIFE & HEALTH DIVISION, ARKANSAS INSURANCE DEPARTMENT

Company Name: Pruco Life Insurance Company

Company NAIC Code: 79227

Company Contact Person & Telephone # Pamela Bonaparte-Golding (203) 944-7544

<u>INSURANCE DEPARTMENT USE ONLY</u>		
ANALYST: _____	AMOUNT: _____	ROUTE SLIP: _____

ALL FEES ARE PER EACH INSURER. PER ANNUAL STATEMENT LINE OF BUSINESS.
UNLESS OTHERWISE INDICATED.

FEE SCHEDULE FOR ADMITTED INSURERS

RATE/FORM FILINGS

Life and/or Disability policy form filing and review, per each policy, contract, annuity form, per each insurer, per each filing. * ____ x \$ 50 = ____
**Retaliatory ____

Life and/or Disability - Filing and review of each rate filing or loss ratio guarantee filing, per each insurer. * ____ x \$ 50 = ____
**Retaliatory ____

Life and/or Disability: Filing and review of Annuity Forms: Filing and review of each certificate, rider, endorsement or application if each is filed separately from the basic form. * 4 x \$ 20 = \$80
**Retaliatory ____

Life and/or Disability: Filing and review of Insurer's advertisements, per advertisement, per each insurer. * ____ x \$ 25 = ____
**Retaliatory ____

AMEND CERTIFICATE OF AUTHORITY

Review and processing of information to amend an Insurer's Certificate of Authority. * ____ x \$400= ____

Filing to amend Certificate of Authority. *** ____ x \$100= ____

*THESE FEES ARE PAYABLE UNDER THE NEW FEE SCHEDULE AS OUTLINED UNDER RULE AND REGULATION 57.

**THESE FEES ARE PAYABLE UNDER THE OLD FEE SCHEDULE AS OUTLINED UNDER ARK. CODE ANN. 23-63-102, RETALIATORY TAX.

***THESE FEES ARE PAYABLE AS REQUIRED IN ARK. ANN. § 23-61-401.

SERFF Tracking Number: PRUD-125904398 *State:* Arkansas
Filing Company: Pruco Life Insurance Company *State Tracking Number:* 40927
Company Tracking Number: P-SCH-HD7-DB(1/09)
TOI: A02.1G Group Annuities - Deferred Non-Variable and Variable *Sub-TOI:* A02.1G.002 Flexible Premium
Product Name: P-SCH-HD7-DB(1/09)
Project Name/Number: P-SCH-HD7-DB(1/09)/P-SCH-HD7-DB(1/09)

Superseded Attachments

Please note that all items on the following pages are items, which have been replaced by a newer version. The newest version is located with the appropriate schedule on previous pages. These items are in date order with most recent first.

Original Date:	Schedule	Document Name	Replaced Date	Attach Document
No original date	Supporting Document	Cover Letter	11/14/2008	Cover letter PRUCO Arkansas.pdf



Prudential Annuities
A Business of Prudential Financial, Inc.
1 Corporate Dr
Shelton, CT 06484
(800) 752-6342

VIA SERFF

November 14, 2008

Hon. Walter Bell
Commissioner of Insurance
Department of Insurance
201 Monroe Street, Suite 1700
Montgomery, AL 36104

Attn: Rates and Forms Division

RE: Pruco Life Insurance Company ("Pruco," "we," "us")
NAIC #79227 FEIN # 22-1944557

Forms Submitted for Approval:

Schedule Supplement Form P-SCH-HD7-LIA(1/09) For use with Rider Form P-RID-HD7-LIA(7/08).
Approved on May 7, 2008 File No. PRUD-125631808

Schedule Supplement Form P-SCH-HD7-DB(1/09) For use with Rider Form P-RID-HD7-DB(7/08)
Approved on May 2, 2008 File No. PRUD-125626324

Schedule Supplement Form P-SCH-HD7(1/09) For use with Rider Form P-RID-HD7(1/08)
Approved on November 29, 2007 File No. PRUD-125356407

Schedule Supplement Form P-SCH-HDLT(1/09) For use with Rider Form P-RID-HDLT(1/07)
Approved on March 22, 2007, File No. PRUD-125090121

Dear Reviewer:

Pruco respectfully submits the referenced forms for your approval. Once your Department approves this filing, these forms will be offered as optional benefits for any new and existing annuity business (that has received your Department's prior approval) in a non-discriminatory manner.

In addition to any new benefit election, we may allow annuity owners that have an existing benefit to elect the terms contained in the referenced schedule pages without canceling the guarantees provided by the existing benefit. The main difference in the referenced schedule pages and the prior approved schedule pages is the Benefit Transfer Formula is adjusted to place a 90% cap on transfers of the account value to the Benefit Transfer Account. Another difference is an "Effective Date of the 90% Cap Rule" item has been added to indicate the effective date. As in the prior approved versions, this Rider will make use of a transfer formula to monitor investment performance and move funds between the investment options selected by the annuity holder and a transfer account to mitigate the risks borne by the company associated with the optional rider's guarantees.

The annuity forms submitted are designed for use for qualified and non-qualified sales, as defined in the Internal Revenue Code. Should this Rider be used with certain qualified sales described under the Internal Revenue Code, the appropriate endorsement, approved or accepted by your Department, will be provided to the annuity holder and will be made part of the annuity to satisfy any federal qualified usage requirements.

Any brackets in the Schedule Supplements indicate that we reserve the right to change the information shown within brackets, without re-filing with your Department, based on new business requirement and any specific classifications of annuity holders to which we wish to offer these benefits. Statements of Variable Material are included with this filing to describe how variable information may change.

Please note that actuarial memorandums, and any related material, are enclosed with this submission. These actuarial memorandums are annuity product-specific. Any certifications or other materials Pruco

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believes you require are also enclosed. Pruco believes that federal law exempts these forms from any "Flesch score" or readability requirements in your statutes or regulations. Unless otherwise informed, Pruco

reserves the right to alter the pagination, layout, including sequential order, color, and typeface of these forms. Pruco confirms any such change will be in conformance with your State's filing requirements.

Please contact the undersigned as indicated below if you have any questions or require additional information.

Sincerely,



Pamela Bonaparte-Golding

Contract Specialist

PH: (203) 944-7544

Email: pamela.bonaparte-golding@prudential.com

Fax: (203) 944- 7737

Enclosures