

SERFF Tracking Number: SYMX-125935766 State: Arkansas
 Filing Company: Symetra Life Insurance Company State Tracking Number: 41059
 Company Tracking Number: LIA-86 11/08
 TOI: A021 Individual Annuities- Deferred Non- Sub-TOI: A021.003 Single Premium
 Variable
 Product Name: LIA-86 11/08 Required Minimum Distribution Endorse
 Project Name/Number: IA- Income Annuities/AF AR0006810F01

Filing at a Glance

Company: Symetra Life Insurance Company

Product Name: LIA-86 11/08 Required Minimum Distribution Endorse SERFF Tr Num: SYMX-125935766 State: ArkansasLH

TOI: A021 Individual Annuities- Deferred Non-Variable

SERFF Status: Closed State Tr Num: 41059

Sub-TOI: A021.003 Single Premium

Filing Type: Form

Co Tr Num: LIA-86 11/08

State Status: Approved-Closed

Co Status:

Reviewer(s): Linda Bird

Author: Symetra Life

Disposition Date: 12/16/2008

Date Submitted: 12/08/2008

Disposition Status: Approved

Implementation Date Requested: 01/05/2009

Implementation Date:

State Filing Description:

General Information

Project Name: IA- Income Annuities

Status of Filing in Domicile: Not Filed

Project Number: AF AR0006810F01

Date Approved in Domicile:

Requested Filing Mode: Review & Approval

Domicile Status Comments:

Explanation for Combination/Other:

Market Type: Individual

Submission Type: New Submission

Group Market Size:

Overall Rate Impact:

Group Market Type:

Filing Status Changed: 12/16/2008

State Status Changed: 12/16/2008

Deemer Date:

Corresponding Filing Tracking Number:

Filing Description:

RE: Symetra Life Insurance Company

NAIC No. 1129-68608, FEIN: 91-0742147

Form numbers: LIA-86 11/08 Required Minimum Distribution Endorsement

LIA-56 9/08 Individual Retirement Annuity Endorsement

SERFF Tracking Number: SYMX-125935766 State: Arkansas
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Company Tracking Number: LIA-86 11/08
TOI: A02I Individual Annuities- Deferred Non- Sub-TOI: A02I.003 Single Premium
Variable
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LIA-75 10/08 Application

Dear Sir or Madam,

On behalf of Symetra Life Insurance Company, please find enclosed for your review and approval the above referenced forms. These forms do not deviate from company or industry standards.

Form LIA-86 11/08 is a new form and does not replace any forms currently in use in your state. Upon approval, this endorsement will be used with all approved deferred payout annuity contracts. This endorsement allows withdrawals before annuity payments begin, in order to satisfy Required Minimum Distribution requirements for Qualified funds. These Required Minimum Distributions are based on the fair market value of the contract as defined by the IRS. Should a client choose to take the Required Minimum Distribution from this contract (as opposed to their other Qualified funds), these withdrawals will result in a proportional adjustment to the future annuity payments as described in the endorsement.

Form LIA-56 9/08 replaces form LIA-56 2/05, approved in your state on July 28, 2005 (SERFF #USPH-6CNPYY562/00). The changes to this Endorsement were necessary to conform annuity contracts to IRS guidelines.

Form LIA-75 10/08 replaces form LIA-75 2/08, approved by your state on April 8, 2008 (DOI File # 38514). Changes to the application were necessary to account for Required Minimum Distribution requirements.

The Flesch Score for LIA-86 9/08 is 50.0. The Flesch Score for LIA-75 10/08 is 50.0. LIA-56 9/08 contains federally mandated language and is exempt from the Flesch requirement.

This product is designed and manufactured to be sold across multiple markets, serviced by various distribution channels at Symetra Life. Thorough product training is provided to these distribution channels for all distributors.

Should you have any questions or concerns regarding this filing, please feel free to contact me at the number listed below or via email. Thank you for your time and consideration.

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Sincerely,

Linda Porter
 Insurance Compliance Unit
 800/796-3872 ext. 65495
 linda.porter@symetra.com

Company and Contact

Filing Contact Information

Linda Porter, State Filings Analyst
 P.O. Box 34690 SC-11
 Seattle, WA 98124-1690

Linda.Porter@Symetra.com
 (425) 256-8000 [Phone]
 (425) 256-5466[FAX]

Filing Company Information

Symetra Life Insurance Company
 P.O. Box 34690
 Seattle, WA 98124-1690
 (425) 256-8000 ext. [Phone]

CoCode: 68608
 Group Code: 1129
 Group Name:
 FEIN Number: 91-0742147

State of Domicile: Washington
 Company Type:
 State ID Number: 667

Filing Fees

Fee Required? Yes
 Fee Amount: \$60.00
 Retaliatory? No
 Fee Explanation: 2 endorsements & 1 application @ \$20.00 each = \$60.00
 Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Symetra Life Insurance Company	\$60.00	12/08/2008	24384299

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Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved	Linda Bird	12/16/2008	12/16/2008

SERFF Tracking Number: SYMX-125935766 *State:* Arkansas
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Disposition

Disposition Date: 12/16/2008

Implementation Date:

Status: Approved

Comment:

Rate data does NOT apply to filing.

SERFF Tracking Number: SYMX-125935766 State: Arkansas
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Form Schedule

Lead Form Number: LIA-86 11/08

Review Status	Form Number	Form Type	Form Name	Action	Action Specific Data	Readability	Attachment
	LIA-86 11/08	Certificate Amendmen t, Insert Page, Endorseme nt or Rider	Required Minimum Distribution Endorsement	Initial		50	LIA-86 11_08 .PDF
	LIA-56 9/08	Certificate Amendmen t, Insert Page, Endorseme nt or Rider	Individual Retirement Annuity Endorsement	Initial		0	LIA-56 9_08.PDF

Required Minimum Distribution Endorsement

This endorsement is made a part of the Annuity Contract to which it is attached.

The following is added to Article III, Section (a) of your Individual Retirement Annuity Endorsement:

Distribution requests. Once each year, beginning in the year you turn age 70½, up to and including the year in which your Annuity Payments begin, you may request a distribution of the Required Minimum Distribution (RMD) as determined by Symetra for your contract. This distribution will not be made unless you request it. Distributions cannot be requested once Annuity Payments begin. Symetra will calculate the RMD amount as required under the Internal Revenue Code and Regulations.

Adjustment to Annuity Payments. **In any year an RMD distribution is made, we will adjust your Annuity Payment amount** and send you a new schedule of benefits. Your Annuity Payment will be reduced by a percentage equal to:

$$\frac{1}{L}$$

where: **L** is your life expectancy as determined under Income Tax Regulations §1.401(a)(9).

If you defer your age 70½ RMD distribution until the year after you turn age 70½, you may request a second RMD distribution in the year after you turn age 70½ to satisfy the Required Minimum Distribution for that year. In all subsequent years, up to the year your Annuity Payments begin, you may request no more than one RMD each year.

Adjustment to Death Benefit. If your contract provides a death benefit prior to the Payment Start Date, any prior distributions will be subtracted from your Death Benefit.

Minimum amount of Annuity Payments. If the amount of your adjusted Annuity Payment is less than \$100, we may modify the payment frequency to provide equivalent payments less often.

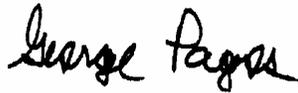
The following replaces the State-Required Benefits provision of your contract:

The Annuity Payments under this Contract as shown on the application and schedule of benefits are not less than the minimum benefits required by the statute of any state in which this Contract is issued. The present value of the Annuity Payments on the Payment Start Date is guaranteed to be no less than 90% of the Purchase Payment compounded at 3% per year from the Contract Date, less any prior RMD distributions compounded at 3% per year from the date of the distributions to the Payment Start Date.

Effective Date: _____

All other terms and conditions of the Contract remain unchanged.

Symetra Life Insurance Company



George C. Pagos
Vice President and Secretary

Individual Retirement Annuity Endorsement

This endorsement is made a part of the Annuity Contract to which it is attached, and the following provisions apply in lieu of any provisions in the Contract to the contrary. The Owner has established an Individual Retirement Annuity under Internal Revenue Code §408 to provide for his or her retirement and for the support of his or her Beneficiaries after death. The purpose of this endorsement is to conform the annuity contract to the IRA rules contained in EGTRRA (P. L. 107-16 and technical corrections thereto) and the final regulations under IRC section 401(a)(9).

ARTICLE I

The Contract is established for the exclusive benefit of the individual or his or her beneficiaries.

ARTICLE II

(a) Only a transfer or rollover contribution (as permitted by Internal Revenue Code §§402(c), 402(e)(6), 403(a)(4), 403(b)(8), 403(b)(10), 408(d)(3) and 457(e)(16)) will be accepted.

(b) No contributions will be accepted under a SIMPLE IRA plan established by any employer pursuant to Code §408(p).

ARTICLE III

(a) Notwithstanding any provision of this IRA to the contrary, the distribution of the individual's interest in the IRA shall be made in accordance with the requirements of Code §408(b)(3) and the regulations thereunder, the provisions of which are herein incorporated by reference. If distributions are not made in the form of an annuity on an irrevocable basis (except for acceleration), then distribution of the interest in the IRA (as determined under Article IV (c)) must satisfy the requirements of Code §408(a)(6) and the regulations thereunder, rather than paragraphs (b), (c) and (d) below and Article IV.

(b) The entire interest of the individual for whose benefit the contract is maintained will commence to be distributed no later than the first day of April following the calendar year in which such individual attains age 70½ (the "required beginning date") over (a) the life of such individual or the lives of such individual and his or her designated beneficiary or (b) a period certain not extending beyond the life expectancy of such individual or the joint and last survivor expectancy of such individual and his or her designated beneficiary. Payments must be made in periodic payments at intervals of no longer than 1 year and must be either nonincreasing or they may increase only as provided in Q&As-1 and -4 of §1.401(a)(9)-6 of the Income Tax Regulations. In addition, any distribution must satisfy the incidental benefit requirements specified in Q&A-2 of §1.401(a)(9)-6.

(c) The distribution periods described in paragraph (b) above cannot exceed the periods specified in §1.401(a)(9)-6 of the Income Tax Regulations.

(d) The first required payment can be made as late as April 1 of the year following the year the individual attains age 70½ and must be the payment that is required for one payment interval. The second payment need not be made until the end of the next payment interval.

ARTICLE IV

(a) **Death On or After Required Distributions Commence.** If the individual dies on or after required distributions commence, the remaining portion of his or her interest will continue to be distributed under the contract option chosen.

(b) **Death Before Required Distributions Commence.** If the individual dies before required distributions commence, his or her entire interest will be distributed at least as rapidly as follows:

(1) If the designated beneficiary is someone other than the individual's surviving spouse, the entire interest will be distributed, starting by the end of the calendar year following the calendar year of the individual's death, over the remaining life expectancy of the designated beneficiary, with such life expectancy determined using the age of the beneficiary as of his or her birthday in the year following the year of the individual's death, or, if elected, in accordance with paragraph (b)(3) below.

(2) If the individual's sole designated beneficiary is the individual's surviving spouse, the entire interest will be distributed, starting by the end of the calendar year following the calendar year of the individual's death (or by the end of the calendar year in which the individual would have attained age 70½, if later), over such spouse's life, or, if elected, in accordance with paragraph (b)(3) below. If the surviving spouse dies before required distributions commence to him or her, the remaining interest will be distributed, starting by the end of the calendar year following the calendar year of the spouse's death, over the spouse's designated beneficiary's remaining life expectancy determined using such beneficiary's age as of his or her birthday in the year following the death of the spouse, or, if elected, will be distributed in accordance with paragraph (b)(3) below. If the surviving spouse dies after required distributions commence to him or her, any remaining interest will continue to be distributed under the contract option chosen.

(3) If there is no designated beneficiary, or if applicable by operation of paragraph (b)(1) or (b)(2) above, the entire interest will be distributed by the end of the calendar year containing the fifth anniversary of the individual's death (or of the spouse's death in the case of the surviving spouse's death before distributions are required to begin under paragraph (b)(2) above.)

(4) Life expectancy is determined using the Single Life Table in Q&A-1 of §1.401(a)(9)-9 of the Income Tax Regulations. If distributions are being made to a surviving spouse as the sole designated beneficiary, such spouse's remaining life expectancy for a year is the number in the Single Life Table corresponding to such spouse's age in the year. In all other cases, remaining life expectancy for a year is the number in the Single Life Table corresponding to the beneficiary's age in the year specified in paragraph (b)(1) or (2) and reduced by 1 for each subsequent year. If distributions have commenced in accordance with an annuity option provided under the contract, then no recalculation of life expectancy will occur.

(c) The "interest" in the IRA includes the amount of any outstanding rollover or transfer under Q&As-7 and -8 of §1.408-8 of the Income Tax Regulations and the actuarial value of any other benefits provided under the IRA, such as guaranteed death benefits.

(d) For purposes of paragraphs (a) and (b) above, required distributions are considered to commence on the individual's required beginning date or, if applicable, on the date distributions are required to begin to the surviving spouse under paragraph (b)(2) above. However, if distributions start prior to the applicable date in the preceding sentence, on an irrevocable basis (except for acceleration) under an annuity contract meeting the requirements of §1.401(a)(9)-6 of the Income Tax Regulations, then required distributions are considered to commence on the annuity starting date.

(e) If the sole designated beneficiary is the individual's surviving spouse, the spouse may elect to treat the IRA as his or her own IRA. This election will be deemed to have been made if such surviving spouse fails to take required distributions as a beneficiary.

ARTICLE V

The interest of the individual is nonforfeitable.

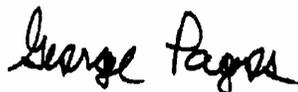
This contract is nontransferable by the individual.

ARTICLE VI

The issuer of an individual retirement annuity shall furnish annual calendar year reports concerning the status of the annuity and such information concerning required minimum distributions as is prescribed by the Commissioner of Internal Revenue.

All other terms and conditions of the Contract remain unchanged.

Symetra Life Insurance Company



George C. Pagos
Vice President and Secretary

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Rate Information

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Supporting Document Schedules

Review Status:

Satisfied -Name: Certification/Notice

12/08/2008

Comments:

Attachment:

AR - READABILITY CERTIFICATION.PDF

Review Status:

Satisfied -Name: Statement of Variability

12/08/2008

Comments:

Attachment:

Statement of Variability.PDF

STATE OF ARKANSAS
READABILITY CERTIFICATION

COMPANY NAME: Symetra Life Insurance Company

This is to certify that the form(s) referenced below has achieved a Flesch Reading Ease Score as indicated below and complies with the requirements of Ark. Stat. Ann. Section 66-3251 through 66-3258, cited as the Life and Disability Insurance Policy Language Simplification Act.

Form Number	Score
LIA-86 11/08	50
LIA-56 9/08	Not required – federally mandated language
LIA-75 10/08	50

Signed: _____



Name:

Michael F. Murphy

Title:

Assistant Vice President

Date:

December 8, 2008

Variable Materials for Form LIA-75 10/08

The following items are being filed in brackets:

Product Marketing Name

Freedom Income - May change for marketing purposes in the future

Minimum Purchase Payment

\$5,000 - \$20,000 - Reflects the purchase payment made by the client

Payment Start Date

Payment Start Date will be no more than 30-60 years from purchase date, or age 95, whichever occurs first

Annual Payment Increase

Annuity Payment may increase up to 6 ½ % per year - amount is chosen at time of application

Period Certain

Period during which payments are guaranteed - minimum 3 to 5 years, chosen at time of application

Owner

As specified in contract, for non-qualified contracts, if Owner is a natural person, Owner must be Annuitant

Joint Owner

As specified in contract, Joint Owner must be spouse of Owner and must also be named Joint Annuitant

Maximum issue age:

Owner Maximum Issue Age: 85-100

Joint Owner Maximum Issue Age: 85-100

Annuitant Maximum Issue Age: 85-100

Joint Annuitant Maximum issue age: 85-100