Filing at a Glance

Company: ING Life Insurance and Annuity Company

Product Name: E-GIRA-ERO-08	SERFF Tr Num: HRTD-125416143	State: ArkansasLH
TOI: A02G Group Annuities - Deferred Non-variable	SERFF Status: Closed	State Tr Num: 38467
Sub-TOI: A02G.003 Single Premium	Co Tr Num: E-GIRA-ERO-08	State Status: Approved-Closed
Filing Type: Form	Co Status:	Reviewer(s): Linda Bird
	Authors: Marylou Tripp, Nora Baranowski	Disposition Date: 04/01/2008
	Date Submitted: 03/20/2008	Disposition Status: Approved
Implementation Date Requested: On Approval		Implementation Date:

State Filing Description:

General Information

Project Name: E-GIRA-ERO-08 - Auto Roth Rollover IRA
Project Number: E-GIRA-ERO-08
Requested Filing Mode:
Explanation for Combination/Other:
Submission Type: New Submission
Overall Rate Impact:
Filing Status Changed: 04/01/2008
State Status Changed: 04/01/2008
Corresponding Filing Tracking Number:

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: Employer

Deemer Date:

Filing Description:

Re: ING Life Insurance and Annuity Company,
NAIC #86509, FEIN # 71-029478
ENDORSEMENT Form: E-GIRA-ERO-08

On behalf of ING Life Insurance and Annuity Company (ILIAC), the above-captioned form is being submitted for your review and approval. It does not contain any unusual or possibly controversial items from normal company or industry

standards. The endorsement is a new form and does not replace any previously approved form.

Form E-GIRA-ERO-08 endorses the group fixed, single premium deferred annuity Certificate GIRAC-ERO-05 (or state specific versions thereof), approved by your Department on 7/06/05.

When issued, the endorsement amends the Certificate to meet the qualification requirements for a Roth Individual Retirement Annuity (IRA) under Section 408A and 401(a)(31)(B) of the Internal Revenue Code (the Code). The Roth IRA is intended to only accept a lump sum rollover contribution made pursuant to Code Section 401(a)(31)(B), or a rollover on behalf of missing participants in terminated plans, or on behalf of participants in abandoned plans who have not otherwise elected disposition of their account balances, consistent with applicable law, regulation or ruling, from a designated Roth account described in Code Section 402A.

We would like to begin using this endorsement immediately upon approval; therefore, your earliest review would be appreciated.

The endorsement is submitted in final printed form, subject to only minor modification in paper stock, ink, border, company logo, and adaptation to computer printing and the possible inclusion of a barcode. The above form have been filed with our domiciliary state of Connecticut. Please be advised that endorsement form E-GIRA-ERO-08 has achieved a 53.7 Flesch readability score.

We appreciate your efforts and attention to this filing. Please do not hesitate to call me if you have any questions or need any additional information to help assist in your review at (860) 580-2854, or toll free at (800) 654-8065 (Ext. 580-2854) or Email: Marylou.Tripp@US.ING.COM.

Company and Contact

Filing Contact Information

Nora Baranowski, Nora.Baranowski@us.ing.com
One Orange Way (860) 580-2810 [Phone]
Windsor, CT 06095 (860) 580-4844[FAX]

Filing Company Information

ING Life Insurance and Annuity Company
One Orange Way
Windsor, CT 06095
(800) 654-8065 ext. [Phone]

CoCode: 86509
Group Code: 229
Group Name:
FEIN Number: 71-0294708

State of Domicile: Connecticut
Company Type:
State ID Number:

Filing Fees

Fee Required?	Yes
Fee Amount:	$20.00
Retaliatory?	No
Fee Explanation:	
Per Company:	No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
ING Life Insurance and Annuity Company	$20.00	03/20/2008	18826109

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved	Linda Bird	04/01/2008	04/01/2008

Disposition

Disposition Date: 04/01/2008

Implementation Date:

Status: Approved

Comment:

Rate data does NOT apply to filing.

SERFF Tracking Number:	*HRTD-125416143*	*State:*	*Arkansas*
Filing Company:	*ING Life Insurance and Annuity Company*	*State Tracking Number:*	*38467*
Company Tracking Number:	*E-GIRA-ERO-08*		
TOI:	*A02G Group Annuities - Deferred Non-variable*	*Sub-TOI:*	*A02G.003 Single Premium*
Product Name:	*E-GIRA-ERO-08*		
Project Name/Number:	*E-GIRA-ERO-08 - Auto Roth Rollover IRA/E-GIRA-ERO-08*		

Item Type	Item Name	Item Status	Public Access
Supporting Document	Certification/Notice		Yes
Supporting Document	Application		No
Supporting Document	Life & Annuity - Acturial Memo		No
Form	Code Section 408A Automatic Roth Rollover IRA Endorsement		Yes

Form Schedule

Lead Form Number: E-GIRA-ERO-08

Review Status	Form Number	Form Type	Form Name	Action	Action Specific Data	Readability	Attachment
	E-GIRA-ERO-08	Certificate Amendment, Insert Page, Endorsement or Rider	Code Section 408A Automatic Roth Rollover IRA Endorsement	Initial		54	E-GIRA-ERO-08.pdf

ING Life Insurance and Annuity Company

Code Section 408A "Automatic Roth Rollover IRA" Endorsement

This Endorsement is part of the Contract or Certificate to which it is attached. The purpose of this Endorsement is to amend the Contract or Certificate to meet the qualification requirements for a Roth Individual Retirement Annuity under Code Section 408A and 401(a)(31)(B).

The following provisions amend the terms of the Contract or Certificate, and the terms of the Endorsement shall prevail in case of a conflict with the terms of the Contract or Certificate.

The following sections **Contract Schedule II – Income Phase** or **Certificate Schedule II – Income Phase** are amended as follows:

Delete the **Annuity Start Date** provision from the **Contract Schedule II – Income Phase** or **Certificate Schedule II – Income Phase** and replace it with the following:

The date Annuity payments are scheduled to begin as elected by the Certificate Holder. We reserve the right to make a lump-sum payment if the Individual Account value is insufficient to elect an Annuity or if the Certificate Holder does not respond to our Annuity Start Date notification.

Any Company-initiated full withdrawal of the Individual Account value at the Annuity Start Date may not be reinstated.

The following definitions replace those found in the Contract and Certificate:

Applicant
An applicable retirement plan described in Section 402A(e)(1) of the Internal Revenue Code or the trustees or administrator of such a plan that is funded by a contract offered by the Company or its affiliates. The Applicant shall request the Contract Holder to establish the Individual Account on behalf of the Certificate Holder. All information on the Certificate Holder, including the address for Certificate delivery, will be provided to the Company by the Applicant.

Contribution
An eligible IRA rollover from a designated Roth account described in Section 402A of the Code made pursuant to Code Section 401(a)(31)(B), or a rollover of such designated Roth account made on behalf of a missing individual in a terminated plan or a participant in an abandoned plan who has an Individual Account value of at least $5,050 and has not elected disposition of benefits, consistent with federal law or regulations. As required by the residency state of the Certificate Holder, the Contribution may be reduced by any applicable premium tax due.

Individual Account
An account established separately for each Certificate Holder to maintain a record of transactions and the value of the lump sum rollover Contribution.

Section 1.12, Reports is deleted and replaced with the following:

After each calendar year we provide the Contract Holder and the Certificate Holder with a report of the Individual Account value and the current credited interest rates for the Fixed Account and such information concerning required minimum distributions as is prescribed by the Commissioner of Internal Revenue.

Section 2.01, Contributions is deleted and replaced with the following:

We reserve the right to establish a minimum Contribution amount of more than $1,000 and not greater than $5,000. These amounts may be increased as allowed by federal law or regulations. We also reserve the right to refuse to accept any Contribution. The only permitted lump sum Contribution under the Contract is an eligible IRA rollover(s) from a designated Roth account described in Section 402A of the Code made pursuant to Code section 401(a)(31)(B), or a rollover of such designated Roth account made on behalf of a missing individual in a terminated plan consistent with federal law or regulation. Additionally, notwithstanding the minimum Contribution amount specified above, the Contract permits an eligible IRA rollover from a designated Roth account made on behalf of a participant in an abandoned plan who has an Individual Account value of at least $5,050 and has not elected disposition of benefits, consistent with federal law or regulation. No other IRA rollover, traditional IRA deductible or non-deductible contribution or any Roth IRA contributions are permitted. A rollover from an eligible retirement plan other than a designated Roth account can not be made to this IRA.

The Contract Holder, as directed by a written agreement with an Applicant, may establish an Individual Account on behalf of each Certificate Holder and direct a lump-sum rollover Contribution into this Account.

Contributions to Individual Accounts must be in cash and may be limited as provided in the Code.

Section 4.04, Required Distributions is deleted and replaced with the following:

While an Individual Account remains in the Accumulation Phase, the Code may require distribution of all or a portion of the Individual Account value. The Certificate Holder or Beneficiary, as applicable, may elect to tell us when to begin distributions. We have no responsibility for adverse tax consequences as the result of the Certificate Holder or Beneficiary, as applicable, not complying with minimum distribution requirements.

Generally, to meet distribution requirements, the Certificate Holder or Beneficiary, as applicable, may request a full or partial withdrawal or an Annuity option.

(a) General Requirement: Notwithstanding any provision of the Contract to the contrary, the distribution of the Certificate Holder's Individual Account value shall be made in accordance with the requirements of Code section 408(b)(3), as modified by section 408A(c)(5), 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 Individual Account value must satisfy the requirements of Code section 408(a)(6), as modified by Section 408A(c)(5), and the regulations there under, rather than paragraphs (c), (d), (e) and (f) below.

(b) No amount is required to be distributed prior to the death of the Certificate Holder.

(c) Upon the death of the Certificate Holder, his or her interest will be distributed at least as rapidly as follows:

(i) If the designated Beneficiary is someone other than the Certificate Holder's surviving spouse, the entire Individual Account value will be distributed, starting by the end of the calendar year following the calendar year of the Certificate Holder's death, over a period not exceeding 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 Certificate Holder's death, or, if elected, in accordance with paragraph (c)(iii) below.

(ii) If the Certificate Holder's sole designated Beneficiary is the Certificate Holder's surviving spouse, the entire Individual Account value will be distributed, starting by the end of the calendar year following the calendar year of the Certificate Holder's death (or by the end of the calendar year in which the Certificate Holder would have attained age 70 1/2, if later), over a period not exceeding such spouse's life, or, if elected, in accordance with paragraph (c)(iii) below. If the surviving spouse dies before required distributions commence to him or her, the remaining Individual Account value will be distributed, starting by the end of the calendar year following the calendar year of the spouse's death, over a period not exceeding 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 (c)(iii) below. If the surviving spouse dies after required distributions commence to him or her, any remaining Individual Account value will continue to be distributed under the Annuity option chosen.

(iii) If there is no designated Beneficiary, or if applicable by operation of paragraph (c)(i) or (c)(ii) above, the entire Individual Account value will be distributed by the end of the calendar year containing the fifth anniversary of the Certificate Holder'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 (c)(ii) above).

(iv) Life expectancy is determined using the Single Life Table in Q&A-1 of section 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 (c)(i) or (c)(ii) and reduced by 1 for each subsequent year.

d) The interest in the IRA includes the amount of any outstanding rollover, transfer and recharacterization under Q&As-7 and -8 of Section 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.

e) For purposes of paragraphs (c) (ii) above, required distributions are considered to commence on the date distributions are required to begin to the surviving spouse under such paragraph. 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 section 1.401(a)(9)-6 of the regulations, then required distributions are considered to commence on the Annuity Start Date.

f) If the sole designated Beneficiary is the Certificate Holder's surviving spouse, the spouse may elect to treat the Individual Account 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.

The effective date of this Endorsement is the later of the Effective Date of the Contract or Certificate or the date the Endorsement is attached to the Contract or Certificate

President
ING Life Insurance and Annuity Company

Rate Information

Rate data does NOT apply to filing.

Supporting Document Schedules

Review Status:

Satisfied -Name: Certification/Notice 01/04/2008

Comments:

Attached is the AR Compliance Certification for this group annuity endorsement filing.

Attachment:

AR Compliance Cert.pdf

Review Status:

Bypassed -Name: Application 01/04/2008

Bypass Reason: N/A to this endorsement filing.

Comments:

Review Status:

Bypassed -Name: Life & Annuity - Acturial Memo 01/04/2008

Bypass Reason: N/A to this endorsement filing.

Comments:

State of **ARKANSAS**

Insurance Division
Arkansas Insurance Department

STATE OF ARKANSAS

CERTIFICATION OF COMPLIANCE

CARRIER: ING Life Insurance and Annuity Company

FORM NUMBER(S): E-GIRA-ERO-08 FORM TITLE(S): Endorsement

I hereby certify that to the best of my knowledge and belief the above form submission complies with Rule and Regulation 19s10 as well as all applicable requirements for the State of Arkansas.

Signature of Officer or Representative

Nora A. Baranowski

Name

Contract Analyst

Title and/or Business Affiliation

March 20, 2008

Date