

SERFF Tracking Number: SYMX-125760613 State: Arkansas
Filing Company: Symetra Life Insurance Company State Tracking Number: 39840
Company Tracking Number: AV AR0000310F02
TOI: A03I Individual Annuities - Deferred Variable Sub-TOI: A03I.002 Flexible Premium
Product Name: RSE-0027 5/08 Guaranteed Long Life Benefit Rider
Project Name/Number: RSE-0027 5/08 Guaranteed Long Life Benefit Rider/AV AR0000310F02

Filing at a Glance

Company: Symetra Life Insurance Company

Product Name: RSE-0027 5/08 Guaranteed Long Life Benefit Rider SERFF Tr Num: SYMX-125760613 State: ArkansasLH

TOI: A03I Individual Annuities - Deferred Variable

Variable

SERFF Status: Closed

State Tr Num: 39840

Sub-TOI: A03I.002 Flexible Premium

Co Tr Num: AV AR0000310F02

State Status: Approved-Closed

Filing Type: Form

Co Status:

Reviewer(s): Linda Bird

Author: Symetra Life

Disposition Date: 08/08/2008

Date Submitted: 08/04/2008

Disposition Status: Approved

Implementation Date Requested: 09/08/2008

Implementation Date:

State Filing Description:

General Information

Project Name: RSE-0027 5/08 Guaranteed Long Life Benefit Rider

Status of Filing in Domicile: Pending

Project Number: AV AR0000310F02

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: 08/08/2008

Deemer Date:

State Status Changed: 08/08/2008

Corresponding Filing Tracking Number:

Filing Description:

Symetra Life Insurance Company

FEIN #91-0742147 NAIC #1129-68608

RSC-0009 6/08 Symetra Focus Contract Data Page

*RSC-0009 6/08 replaces RSC-0009 5/08.

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Company and Contact

Filing Contact Information

Rae Anne O'Keefe, State Filings Coordinator raeanne.okeefe@Symetra.com
 P.O. Box 34690 SC-11 (425) 256-8000 [Phone]
 Seattle, WA 98124-1690 (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: \$20.00
 Retaliatory? Yes
 Fee Explanation:
 Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Symetra Life Insurance Company	\$20.00	08/04/2008	21764725

SERFF Tracking Number: SYMX-125760613 State: Arkansas
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Company Tracking Number: AV AR0000310F02
TOI: A031 Individual Annuities - Deferred Variable Sub-TOI: A031.002 Flexible Premium
Product Name: RSE-0027 5/08 Guaranteed Long Life Benefit Rider
Project Name/Number: RSE-0027 5/08 Guaranteed Long Life Benefit Rider/AV AR0000310F02

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved	Linda Bird	08/08/2008	08/08/2008

SERFF Tracking Number: SYMX-125760613 *State:* Arkansas
Filing Company: Symetra Life Insurance Company *State Tracking Number:* 39840
Company Tracking Number: AV AR0000310F02
TOI: A031 Individual Annuities - Deferred Variable *Sub-TOI:* A031.002 Flexible Premium
Product Name: RSE-0027 5/08 Guaranteed Long Life Benefit Rider
Project Name/Number: RSE-0027 5/08 Guaranteed Long Life Benefit Rider/AV AR0000310F02

Disposition

Disposition Date: 08/08/2008

Implementation Date:

Status: Approved

Comment:

Rate data does NOT apply to filing.

SERFF Tracking Number: SYMX-125760613 State: Arkansas
 Filing Company: Symetra Life Insurance Company State Tracking Number: 39840
 Company Tracking Number: AV AR0000310F02
 TOI: A031 Individual Annuities - Deferred Variable Sub-TOI: A031.002 Flexible Premium
 Product Name: RSE-0027 5/08 Guaranteed Long Life Benefit Rider
 Project Name/Number: RSE-0027 5/08 Guaranteed Long Life Benefit Rider/AV AR0000310F02

Item Type	Item Name	Item Status	Public Access
Supporting Document	Certification/Notice		Yes
Supporting Document	Statement of Variability		Yes
Supporting Document	Application		No
Supporting Document	Life & Annuity - Actuarial Memo		No
Form	Focus contract data page		Yes

SERFF Tracking Number: SYMX-125760613 State: Arkansas
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 TOI: A031 Individual Annuities - Deferred Variable Sub-TOI: A031.002 Flexible Premium
 Product Name: RSE-0027 5/08 Guaranteed Long Life Benefit Rider
 Project Name/Number: RSE-0027 5/08 Guaranteed Long Life Benefit Rider/AV AR0000310F02

Form Schedule

Lead Form Number:

Review Status	Form Number	Form Type	Form Name	Action	Action Specific Data	Readability	Attachment
	RSC-0009 6/08	Data/Declar	Focus contract data ation Pagespage	Initial		0	RSC-0009 6_08.PDF

CONTRACT DATA PAGE

PRODUCT: [Symetra® Focus Variable Annuity]

OWNER: [John Doe]
Address: [1234 Main St.]
[Any City, ST 99999-9999]
Date of Birth: [1/01/1970]
Age: [35] Sex: [Male]

JOINT OWNER: [Jane Doe]
Address: [1234 Main St.]
[Any City, ST 99999-9999]
Date of Birth: [2/01/1970]
Age: [35] Sex: [Female]

ANNUITANT: [John Doe]
Address: [1234 Main St.]
[Any City, ST 99999-9999]
Date of Birth: [1/01/1970]
Age: [35] Sex: [Male]

JOINT ANNUITANT: [Jane Doe]
Address: [1234 Main St.]
[Any City, ST 99999-9999]
Date of Birth: [2/01/1970]
Age: [35] Sex: [Female]

[LONG LIFE BENEFIT ANNUITANT: [John Doe]
Address: [1234 Main St.]
[Any City, ST 99999-9999]
Date of Birth: [1/01/1970]
Age: [35] Sex:[Male]

CONTRACT NUMBER: [LP12345678]

CONTRACT DATE: [5/01/2005]

ANNUITY DATE: Before [1/01/2066]

INITIAL PURCHASE PAYMENT: **[\$50,000]**

[EXPECTED FIRST YEAR PURCHASE PAYMENTS: [\$50,000]]

**GUARANTEED MINIMUM DEATH BENEFIT
AGE EXTENSION RIDER:** [Yes or No]

[CAPITAL PRESERVATION RIDER EFFECTIVE DATE: [5/01/2005]]

**[CAPITAL PRESERVATION RIDER
7 Year Term [Yes or No]
10 Year Term [Yes or No]]**

[GUARANTEED LONG LIFE BENEFIT RIDER [Yes or No]]

[LONG LIFE BENEFIT COMMENCEMENT DATE: [May 1, 2030]]

[LONG LIFE BENEFIT PAYMENT: [\$1,000] per month]

DELIVERED IN THE STATE OF [Any State]

AND GOVERNED BY ITS LAWS.

MAXIMUM ISSUE AGE: [85]. The contract date must be prior to the Owner's and Annuitant's (including any Joint Owner's and Joint Annuitant's) [86th] birthday.

MAXIMUM ANNUITIZATION AGE: [95]. Annuity payments must begin prior to the Annuitant's (including any Joint Annuitant's) [96th] birthday.

MINIMUM INITIAL PURCHASE PAYMENT: [\$10,000]

MINIMUM SUBSEQUENT PURCHASE PAYMENT: [\$10,000]

INSURANCE CHARGES:

MORTALITY AND EXPENSE RISK CHARGE: Equal on an annual basis to [0.95%] of the average daily net assets of each Sub-account.

ASSET-RELATED ADMINISTRATION CHARGE: Equal on an annual basis of the average daily net assets of each Sub-account as follows:

[0.40%] if contract value is less than [\$100,000]

[0.35%] if contract value is between [\$100,000 and \$249,999.99]

[0.25%] if contract value is between [\$250,000 and \$499,999.99]

[0.15%] if contract value is between [\$500,000 and \$999,999.99]

[0.05%] if contract value equal or exceeds [\$1,000,000]

The contract value at the start of the current Contract Year will determine the asset-related administration charge to be applied to the Contract for that Contract Year.

GUARANTEED MINIMUM DEATH BENEFIT AGE EXTENSION RIDER CHARGE: Equal on an annual basis to [0.10%] of the average daily net assets of each Sub-account.

[CAPITAL PRESERVATION RIDER CHARGE:

7 YEAR TERM Equal on an annual basis to [0.95%], assessed pro-rata on a quarterly basis from each Sub-account. The maximum charge for this Rider will never exceed 2.25% of the average daily net assets of each Sub-account.

10 YEAR TERM Equal on an annual basis to [0.60%], assessed pro-rata on a quarterly basis from each Sub-account. The maximum charge for this Rider will never exceed 1.75% of the average daily net assets of each Sub-account.]

[GUARANTEED LONG LIFE BENEFIT RIDER CHARGE: \$[5,000] (this equals [5%] of the expected first year Purchase Payments). This rider charge is taken on each of the 1st ten contract anniversaries and will never change other than in accordance with the Guaranteed Long Life Benefit Rider provisions. This rider charge will never exceed 5% of the Purchase Payments made to your contract in the first Contract Year.]

ANNUAL ADMINISTRATION MAINTENANCE CHARGE: [\$40] each Contract Year. The charge may be changed prior to the Annuity Date, but will never exceed \$50 per Contract Year. The charge will not be deducted if the contract value is [\$50,000] or more when the charge is to be deducted.

MINIMUM WITHDRAWAL: [\$500]. You must withdraw the entire amount out of an investment option if, after a withdrawal, the remaining balance in the investment option would be less than [\$500]. You must withdraw the entire contract value and your Contract will terminate if, after a withdrawal, the remaining contract value would be less than [\$5,000].

SURRENDER CHARGE SCHEDULE:

Complete Years Elapsed Since Receipt of Purchase Payment	Surrender Charge As A Percentage Of Purchase Payments Withdrawn
0	7%
1	7%
2	7%
3	6%
4	6%
5	5%
6	4%
7 or more	0%

WITHDRAWAL CHARGE: [\$25] for each withdrawal after the first withdrawal in a Contract Year. We will not charge for annuity payments, repetitive withdrawals through electronic funds transfer (EFT), or if the entire contract value is withdrawn.

TRANSFERS: The minimum amount you can transfer out of any investment option at one time is [\$500], or the entire value of the investment option if less. You must transfer the entire amount of the investment option if, after a transfer, the remaining balance would be less than [\$500]. The minimum amount you can transfer into any investment option is [\$50].

TRANSFER CHARGE: Each Contract Year, 12 transfers are free of charge. For each transfer after the 12th transfer in a Contract Year, the transfer charge is [\$10] or [2%] of the amount transferred, whichever is less.

PREMIUM TAXES: As of the contract date, premium taxes are not charged in your state. However, if we ever incur such taxes, we reserve the right to make a deduction from your Contract for the payment of the premium taxes assessed in connection with your Contract.

SEPARATE ACCOUNT: [Symetra Separate Account C]

ELIGIBLE INVESTMENTS:

- [1. Fidelity VIP Money Market Portfolio - Initial Class]
- [2. Vanguard VIF - International Portfolio]
- [3. Vanguard VIF - REIT Index Portfolio]
- [4. Vanguard VIF - Mid-Cap Index Portfolio]
- [5. Vanguard VIF - Total Stock Market Index Portfolio]
- [6. Fidelity VIP Index 500 Portfolio - Initial Class]
- [7. Vanguard VIF - High Yield Bond Portfolio]
- [8. Vanguard VIF - Total Bond Market Index Portfolio]
- [9. Vanguard VIF - Balanced Portfolio]
- [10. DWS Small Cap Index VIP - Class A Shares]
- [11. Ibbotson Aggressive Growth ETF Asset Allocation Portfolio - Class I]
- [12. Ibbotson Growth ETF Asset Allocation Portfolio - Class I]
- [13. Ibbotson Balanced ETF Asset Allocation Portfolio - Class I]
- [14. Ibbotson Income and Growth ETF Asset Allocation Portfolio - Class I]
- [15. Ibbotson Conservative ETF Asset Allocation Portfolio - Class I]

ANNUITY SERVICE OFFICE:

Home Office:

Symetra Life Insurance Company
[Retirement Services]
[777 108th Avenue NE Suite 1200]
[Bellevue, WA 98004-5135]

Mailing Address:

Symetra Life Insurance Company
[Retirement Services]
[P.O. Box 3882]
[Seattle, WA 98124-3882]

Telephone: [800-SYMETRA]

[800-796-3872]

Fax: [425-376-5599]

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Rate Information

Rate data does NOT apply to filing.

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Supporting Document Schedules

Review Status:
Satisfied -Name: Certification/Notice 08/04/2008
Comments:
Attachment:
Certification.PDF

Review Status:
Satisfied -Name: Statement of Variability 08/04/2008
Comments:
Attachment:
Statement of Variability.PDF

Review Status:
Bypassed -Name: Application 08/04/2008
Bypass Reason: N/A, this is a contract data page filing only.
Comments:

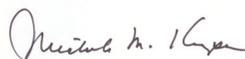
Review Status:
Bypassed -Name: Life & Annuity - Actuarial Memo 08/04/2008
Bypass Reason: N/A, this is a contract data page filing only. There has been no change to the actuarial documentation.
Comments:

CERTIFICATION

THIS IS TO CERTIFY THAT THE ATTACHED FORMS, LISTED BELOW, HAVE BEEN REVIEWED AND TO THE BEST OF MY KNOWLEDGE AND BELIEF MEET THE PROVISIONS OF RULE AND REGULATION 19 AS WELL AS ALL APPLICABLE REQUIREMENTS OF THE ARKANSAS INSURANCE DEPARTMENT.

RSC-0009 6/08

Symetra Focus Contract Data Page



Michele Kemper
Vice President
Symetra Life Insurance Company

STATEMENT OF VARIABILITY

The following items are noted as being variable:

Company Address	In the future, our address may change.
Company Phone Number	In the future, our phone number may change.
Officer Signatures	In the future, different officers may be designated.
Portfolio Names	Portfolio names are noted as variable as we may add or delete portfolios as investment options or the fund companies may change the names of the portfolios they offer.
Expected First Year Purchase Payments	If the optional Guaranteed Long Life Benefit rider applies to this annuity, the annuity owner selects this amount. This number is used to ensure that the rider charge does not exceed 5% of the contract value.
Capital Preservation Rider	This is an optional rider that the policyholder may choose which will guarantee the contract value.
Guaranteed Long Life Benefit Rider	This is an optional rider that the policyholder may choose which will guarantee long life benefit payments.
Long Life Benefit Annuitant	If the optional Guaranteed Long Life Benefit rider applies to the annuity, the sole annuity owner is the long life benefit annuitant. Joint owners cannot choose this rider. If the annuity owner is not a person, then the sole annuity annuitant is the long life benefit annuitant. The long life benefit annuitant must be between the ages of 50 and 75 on the annuity issue date. The long life benefit annuitant cannot be changed once the annuity is in effect.
Capital Preservation Rider Effective Date	If the optional Capital Preservation rider applies to the annuity, the annuity owner selects this date. This date can be the issue date of the underlying annuity or a contract anniversary of the underlying annuity. If the annuity owner elected a rider step-up, this date is the date the step-up took effect.
Capital Preservation Rider Term	If the optional Capital Preservation rider applies to the annuity, the owner of the underlying annuity selects the term. Only one of the available terms can be in effect at a time.
Long Life Benefit Commencement Date	If the optional Guaranteed Long Life Benefit rider applies to the annuity, the contract owner selects the long life benefit commencement date during the annuity application process. Initially, the long life benefit commencement date can be between 15 and 35 years after the issue date of the underlying annuity, as long as the long life benefit commencement date is before the long life annuitant's 96 th birthday.

Long Life Benefit Payment	If the optional Guaranteed Long Life Benefit rider applies to the annuity, the contract owner selects the long life monthly benefit amount during the annuity application process. This amount can range from \$500/month to \$40,000/month.
Capital Preservation Rider Charge	Symetra sets these charges to cover expenses and risk. Charges for new Capital Preservation riders can be changed for competitive reasons and to reflect evolving experience and market costs. The charges will never be more than 2.25% on an annual basis for the 7-year rider term and 1.75% on an annual basis for the 10-year rider term. Annuities without the optional Capital Preservation rider will not be charged Capital Preservation rider charges.
Guaranteed Long Life Benefit Rider Charge	This amount is based on the age and sex of the long life annuitant and the long life benefit deferral period that the owner chooses. Similar long life benefits might have different charges if their underlying annuities have different contract dates. This charge will never be more than 5% of first year annuity purchase payments. Annuities without the optional Guaranteed Long Life Benefit rider will not be charged Guaranteed Long Life Benefit rider charges.
Annual Administration Maintenance Charge	The current charge is \$40 each Contract Year. The charge may be changed prior to the Annuity Date but will never exceed \$50 per Contract Year.
Separate Account	The Separate Account name is noted as variable as we may change the name based on what it is called on the prospectus which is filed with the SEC. We may also change the separate account name if the separate account is ever merged, combined, or otherwise substituted with another separate account. If the Separate Account name changes we will file a limited, partial refiling of the specifications page, as long as the new Separate Account does not significantly alter the underlying structure of the contract.
Capital Preservation Rider Name Reduced Frequency Long Life Benefit Threshold	Based on the distributor or bank this name may change. Symetra can change the long life benefit payment frequency when any individual monthly benefit is less than a certain threshold. This threshold can vary from \$100 to \$1,000. Initially, the threshold will be \$500.
Guaranteed Long Life Benefit Rider Name	Based on the distributor or bank this name may change.