

SERFF Tracking Number: PRUD-125985970 State: Arkansas
 Filing Company: Pruco Life Insurance Company State Tracking Number: 41325
 Company Tracking Number: EDCA-PRUCO
 TOI: A02.1G Group Annuities - Deferred Non- Sub-TOI: A02.1G.002 Flexible Premium
 Variable and Variable
 Product Name: EDCA-PRUCO
 Project Name/Number: EDCA-PRUCO/EDCA-PRUCO

Filing at a Glance

Company: Pruco Life Insurance Company

Product Name: EDCA-PRUCO

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

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

Filing Type: Form

SERFF Tr Num: PRUD-125985970 State: ArkansasLH

SERFF Status: Closed

State Tr Num: 41325

Co Tr Num: EDCA-PRUCO

State Status: Approved-Closed

Co Status: IFSA

Reviewer(s): Linda Bird

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

Disposition Date: 01/15/2009

Date Submitted: 01/13/2009

Disposition Status: Approved

Implementation Date Requested: On Approval

Implementation Date:

State Filing Description:

General Information

Project Name: EDCA-PRUCO

Project Number: EDCA-PRUCO

Requested Filing Mode: Review & Approval

Status of Filing in Domicile: Not Filed

Date Approved in Domicile:

Domicile Status Comments: The enclosed forms have not been submitted to our Home State of Arizona, as they are exempt pursuant to Arizona Revised statues, Section 20-1110.F and the Exemptive Order dated October 22, 2003.

Explanation for Combination/Other:

Submission Type: New Submission

Overall Rate Impact:

Filing Status Changed: 01/15/2009

State Status Changed: 01/15/2009

Corresponding Filing Tracking Number:

Market Type: Group

Group Market Size: Large

Group Market Type: Discretionary

Deemer Date:

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Filing Description:

VIA SERFF

January 13, 2009

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

Attn Claudia Meeks, Rates and Form Filings

RE: Pruco Life Insurance Company ("Pruco," "we," "us")

NAIC #79227 FEIN # 22-1944557

Forms Submitted for Approval:

Rider Form P-RID-EDCA(4/09)

Schedule Page P-SCH-EDCA(4/09)

Dear Ms. Meeks:

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

Forms P-RID-EDCA(4/09) and P-SCH-EDCA(4/09) are similar to prior filed Forms RID-EDCA(3/06) and SCH-EDCA(3/06) that were approved by your Department on February 22, 2006, SERFF Tracking Number SERT-6LTNQX920. We have updated the prior approved forms for new business issue. Just as in the prior approved rider forms, the submitted forms make provision for an enhanced dollar cost averaging program that is only available for new Purchase Payments. Amounts deposited into this program's allocation option are credited interest while this program is in effect. Each month amounts are transferred from this program's allocation option and are allocated to other available

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investment allocation options selected by the Owner, until amounts in this program's allocation option are depleted. The Schedule Supplement stipulates the interest rate to be credited, the minimum guaranteed interest rate under this program, and the minimum monthly transfer amount. There is no additional cost for this Rider.

Any brackets in the enclosed forms 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 any certifications or other materials Pruco believes you require are 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.

Very truly yours,

Pamela Bonaparte-Golding
Contract Specialist
PH: (203) 944-7544, Toll Free (800) 628-6039 Ext 47544
Pamela.Bonaparte-Golding@prudential.com
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

SERFF Tracking Number: PRUD-125985970 *State:* Arkansas
Filing Company: Pruco Life Insurance Company *State Tracking Number:* 41325
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Project Name/Number: EDCA-PRUCO/EDCA-PRUCO

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

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Filing Fees

Fee Required? Yes
Fee Amount: \$40.00
Retaliatory? No
Fee Explanation:
Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Pruco Life Insurance Company	\$40.00	01/13/2009	24988454

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Product Name: EDCA-PRUCO
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Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved	Linda Bird	01/15/2009	01/15/2009

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Disposition

Disposition Date: 01/15/2009

Implementation Date:

Status: Approved

Comment:

Rate data does NOT apply to filing.

SERFF Tracking Number: PRUD-125985970 *State:* Arkansas
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Item Type	Item Name	Item Status	Public Access
Supporting Document	Flesch Certification		No
Supporting Document	Application		No
Supporting Document	Life & Annuity - Acturial Memo		No
Supporting Document	Cover Letter		Yes
Supporting Document	Arkansas 7 Form		Yes
Supporting Document	Arkansas 7a		Yes
Supporting Document	Memo of Variablility		Yes
Form	ENHANCED DOLLAR COST AVERAGING RIDER		Yes
Form	ENHANCED DOLLAR COST AVERAGING SCHEDULE SUPPLEMENT		Yes

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Form Schedule

Lead Form Number: P-RID-EDCA(4/09)

Review Status	Form Number	Form Type	Form Name	Action	Action Specific Data	Readability	Attachment
	P-RID-EDCA(4/09)	Policy/Contract	ENHANCED DOLLAR COST AVERAGING RIDER Certificate: Amendment, Insert Page, Endorsement or Rider	Initial		0	P-RID-EDCA_4-09_.pdf
	P-SCH-EDCA(4/09)	Schedule Pages	ENHANCED DOLLAR COST AVERAGING SCHEDULE SUPPLEMENT	Initial		0	P-SCH-EDCA_4-09_.pdf

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

ENHANCED DOLLAR COST AVERAGING RIDER

This Rider is made part of your Annuity. If the terms of your Annuity and those of this Rider conflict, the provisions of this Rider shall control. During the Accumulation Period, we may, in certain situations, make available an Enhanced Dollar Cost Averaging Program ("Program") designed to transfer Account Value in a Fixed Rate Option to other allocation options that you have specified which we offer under this Program, such transfers to be made on a monthly basis.

This Program is separate from any other dollar cost averaging program we may make available. The Program may be utilized only as permitted by us in accordance with our rules at the time of election, and may not be available in conjunction with other programs and benefits we may make available. You may select this Program by submitting to us a request in Good Order.

Enhanced Dollar Cost Averaging under this Program is subject to the following rules:

- (a) We may restrict this Program to only certain new Purchase Payments.
- (b) We may limit the allocation options into which Account Value may be transferred as part of the Program.
- (c) We may limit this Program to only transfers from the Fixed Rate Options that we make available for this Program.
- (d) Such a Program may only be selected in conjunction with, and simultaneous to, a new Purchase Payment allocation to a Fixed Rate Option we make available for this Program.
- (e) Interest rates will be declared by us on or before the date allocations are made into the Program. Interest rates credited to each Fixed Rate Option we make available for this Program are applied to a declining balance due to the monthly transfer of Account Value to the allocation options you have selected and due to any withdrawals and Optional Benefit Transfers as described below. This will reduce the effective rate of interest credited to a Fixed Rate Option over the course of the duration selected.

The declared rate of interest credited to each Fixed Rate Option we make available for this Program on the Effective Date of this Rider is shown on the Schedule Supplement. If we make this Program available to future Purchase Payment allocations, interest rates for those allocations will be declared on or before the date those allocations are made. The declared rate of interest we credit to each Fixed Rate Option we make available for this Program will never be less than the Minimum Guaranteed Interest Rate shown on the Schedule Supplement.

- (f) We credit interest daily to the amounts in each Fixed Rate Option we make available for this Program at the daily equivalent of a specific rate declared for that Fixed Rate Option until the earliest of: 1) the date the entire amount in the Fixed Rate Option is transferred out of the Fixed Rate Option; 2) the date the entire amount in the Fixed Rate Option is withdrawn; 3) the date as of which any death benefit payable is determined, and 4) the Annuity Date.
- (g) Monthly transfers will be made over the term of the Fixed Rate Option. Please refer to the "Transfers under the Enhanced Dollar Cost Averaging Program" provision below.

- (h) If, at the time you elect this benefit you are in a Right to Cancel period in which any Purchase Payments made may be restricted to specific allocation choices, we will initiate this Program at the expiration of the Right to Cancel period, and we will transfer amounts in accordance with this Program.

TRANSFERS UNDER THE ENHANCED DOLLAR COST AVERAGING PROGRAM: Purchase Payments allocated to this Program are transferred monthly and systematically, based on a duration we make available, to the allocation options you specify. We will transfer amounts in a series of substantially equal amounts on each monthly transfer date. The first transfer from the Fixed Rate Option is made as of the date of the allocation of the applicable Purchase Payment unless your allocation choices are being restricted during a Right to Cancel period, as described in (h) above. In that case, the first transfer under this Program will be made at the expiration of the Right to Cancel period. Subsequent transfers are made monthly. The final transfer includes the interest credited during the period (but see the section below for the effect of withdrawals and Optional Benefit Transfers).

We will make transfers in accordance with your allocation instructions. You may change the allocation options to which transfers under this Program are made by furnishing us with new allocation instructions in Good Order. Any transfers occurring after we receive your new allocation instructions will be made in accordance with the new instructions. Transfers under this Program will be subject to the investment limitations applicable to any other benefit provided under the Annuity. Transfers under this Program do not count toward the maximum number of free transfers permissible under the Annuity, and you are not subject to a transfer fee for transfers under this Program.

EFFECT OF WITHDRAWALS AND OPTIONAL BENEFIT TRANSFERS ON THIS PROGRAM: We will recalculate the monthly transfer amount to reflect the reduction of Account Value in the Fixed Rate Option caused by a withdrawal or transfer of Account Value from the Fixed Rate Option for purposes of supporting the guarantees of any optional benefits provided by your Annuity ("Optional Benefit Transfer"). This recalculation may include some or all of the interest credited to the date of the next scheduled transfer. Any interest that is not included in the recalculated transfer amount will be paid with the final transfer amount, unless there is another subsequent withdrawal or Optional Benefit Transfer. Deductions of the Maintenance Fee or any other charges for optional benefits are treated as withdrawals for this purpose. If a withdrawal or Optional Benefit Transfer reduces the monthly transfer amount below the Minimum Monthly Transfer Amount shown in the Schedule Supplement, the remaining balance in the Program's Fixed Rate Option will be transferred on the next monthly transfer date to the allocation options you most recently selected under this Program. If there is no Account Value remaining in the Fixed Rate Option following a withdrawal or Optional Benefit Transfer, this Program will terminate.

TERMINATION: You may cancel your participation in this Program by submitting a request in Good Order. Your request must include instructions as to how you wish to re-allocate your funds under this Program. If you do not provide such instructions at the time of your request, we will re-allocate your funds on a pro-rata basis among the variable allocation options in which you are already invested. If an allocation option is no longer available, we reserve the right to allocate that portion that would have been applied to such allocation option to the money market allocation option.

PRUCO LIFE INSURANCE COMPANY



Secretary

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

**ENHANCED DOLLAR COST AVERAGING
SCHEDULE SUPPLEMENT**

Annuity Number: [001-00001]

Effective Date of the Enhanced Dollar Cost Averaging Rider: [Issue Date of the Annuity]

Minimum Guaranteed Interest Rate: [3%]

Initial Interest Rate Credited as of the Effective Date of the Rider:

<u>Duration</u>	<u>Daily Equivalent of the</u>
[DCA 6 Month]	<u>Following Annual Rate</u>
	[3.50%]

[Please note that the information and interest rate(s) shown above are effective only as of the Effective Date of this Rider. Any post-Issue Date elections or interest rate changes will not be reflected in this Schedule Supplement, but will be confirmed in a separate report we will send to you.]

Minimum Monthly Transfer Amount: [\$100]

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Rate Information

Rate data does NOT apply to filing.

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Supporting Document Schedules

Satisfied -Name: Cover Letter	Review Status:	01/13/2009
Comments:		
Attachment: PRUCO EDCA COVER LETTER Arkansas.pdf		
Satisfied -Name: Arkansas 7 Form	Review Status:	01/13/2009
Comments:		
Attachment: AR - 7._PRU.pdf		
Satisfied -Name: Arkansas 7a	Review Status:	01/13/2009
Comments:		
Attachment: AR - 7a PRU.pdf		
Satisfied -Name: Memo of Variablility	Review Status:	01/13/2009
Comments:		
Attachment: P-SCH-EDCA_4-09_ Memo of Variability.pdf		



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

VIA SERFF

January 13, 2009

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

Attn Claudia Meeks, Rates and Form Filings

RE: Pruco Life Insurance Company ("Pruco," "we," "us")
NAIC #79227 FEIN # 22-1944557
Forms Submitted for Approval:
Rider Form P-RID-EDCA(4/09)
Schedule Page P-SCH-EDCA(4/09)

Dear Ms. Meeks:

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

Forms P-RID-EDCA(4/09) and P-SCH-EDCA(4/09) are similar to prior filed Forms RID-EDCA(3/06) and SCH-EDCA(3/06) that were approved by your Department on February 22, 2006, SERFF Tracking Number SERT-6LTNQX920. We have updated the prior approved forms for new business issue. Just as in the prior approved rider forms, the submitted forms make provision for an enhanced dollar cost averaging program that is only available for new Purchase Payments. Amounts deposited into this program's allocation option are credited interest while this program is in effect. Each month amounts are transferred from this program's allocation option and are allocated to other available investment allocation options selected by the Owner, until amounts in this program's allocation option are depleted. The Schedule Supplement stipulates the interest rate to be credited, the minimum guaranteed interest rate under this program, and the minimum monthly transfer amount. There is no additional cost for this Rider.

Any brackets in the enclosed forms 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 any certifications or other materials Pruco believes you require are 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.

Very truly yours,

Pamela Bonaparte-Golding
Contract Specialist
PH: (203) 944-7544, Toll Free (800) 628-6039 Ext 47544
Pamela.Bonaparte-Golding@prudential.com
Enclosures

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

STATE OF ARKANSAS

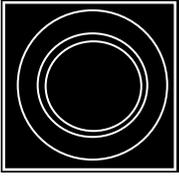
CERTIFICATION OF COMPLIANCE

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 No. P-RID-EDCA(4/09), P-SCH-EDCA(4/09)



Suzanne Hurel – VP, Contracts

January 13, 2009
Date



**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. * 2 x \$ 20 = \$40
**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.

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

**MEMORANDUM OF VARIABILITY FOR
ENHANCED DOLLAR COST AVERAGING
SCHEDULE SUPPLEMENT P-SCH-EDCA(4/09)**

Brackets in the referenced Schedule Supplement designate any variable material. There are two types of variations: those that vary by Annuity Purchaser and those items that vary by class of Annuity Purchaser. For any designated class of Annuity Purchaser the values shown within brackets in the referenced Schedule Supplement will not be applied in a discriminatory manner.

VARIATIONS BY ANNUITY PURCHASER:

Annuity Number: This is the number assigned to the Annuity by us for record keeping purposes.

Effective Date of the Rider: This date will be the Issue Date, if this benefit is elected at the time the Annuity is purchased, or a subsequent date, if this benefit is elected post-issue.

VARIATIONS BY CLASS OF ANNUITY PURCHASER: The following items may vary based on any decisions affecting new business or specific classes of Annuity Purchasers. Minimum and maximum value ranges that may be used are indicated.

Minimum Guaranteed Interest Rate: We reserve the right to change the Minimum Interest Rate to react to any changes in the annuity market place, and to any future changes to the Standard Non-Forfeiture Law. The Minimum Interest Rate will never be less than the minimum nonforfeiture interest rate required by standard Non-Forfeiture Law.

Initial Interest Rate Credited as of the Effective Date of the Rider: This is the rate of interest we credit to allocations to the Enhanced Dollar Cost Averaging Fixed Rate Option on the Effective Date of the Rider. We reserve the right to increase, decrease or eliminate the interest rate credited on future new issues, on new Purchase Payments and for certain classes of Annuity Purchasers, in response to changing economic or competitive conditions. The Initial Interest Rate applies only to the initial purchase payment. Other interest rates will be credited to subsequent Purchase Payments.

Minimum Monthly Transfer Amount: Currently this amount will be \$100. In the future this amount may range between \$25 and \$250.