

SERFF Tracking Number: PALD-126355623 State: Arkansas
Filing Company: Pacific Life Insurance Company State Tracking Number: 43886
Company Tracking Number: E09DBC2
TOI: L08 Life - Other Sub-TOI: L08.000 Life - Other
Product Name: E09DBC2
Project Name/Number: E09DBC2/E09DBC2

Filing at a Glance

Company: Pacific Life Insurance Company

Product Name: E09DBC2

TOI: L08 Life - Other

Sub-TOI: L08.000 Life - Other

Filing Type: Form

SERFF Tr Num: PALD-126355623 State: Arkansas

SERFF Status: Closed-Approved-
Closed State Tr Num: 43886

Co Tr Num: E09DBC2

State Status: Approved-Closed

Reviewer(s): Linda Bird

Author: Jill Dease

Disposition Date: 10/27/2009

Date Submitted: 10/23/2009

Disposition Status: Approved-
Closed

Implementation Date:

Implementation Date Requested: On Approval

State Filing Description:

General Information

Project Name: E09DBC2

Project Number: E09DBC2

Requested Filing Mode: Review & Approval

Explanation for Combination/Other:

Submission Type: New Submission

Overall Rate Impact:

Filing Status Changed: 10/27/2009

Deemer Date:

Submitted By: Jill Dease

Filing Description:

October 23, 2009 NAIC # 00067466

FEIN # 95-1079000

Status of Filing in Domicile: Pending

Date Approved in Domicile:

Domicile Status Comments:

Market Type: Individual

Group Market Size:

Group Market Type:

Explanation for Other Group Market Type:

State Status Changed: 10/27/2009

Created By: Jill Dease

Corresponding Filing Tracking Number:
E09DBC2

Mr. John Shields

Policy Form Filings, Life

Arkansas Department of Insurance

1200 W. Third Street

Little Rock, AR 72201-1904

<i>SERFF Tracking Number:</i>	<i>PALD-126355623</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>Pacific Life Insurance Company</i>	<i>State Tracking Number:</i>	<i>43886</i>
<i>Company Tracking Number:</i>	<i>E09DBC2</i>		
<i>TOI:</i>	<i>L08 Life - Other</i>	<i>Sub-TOI:</i>	<i>L08.000 Life - Other</i>
<i>Product Name:</i>	<i>E09DBC2</i>		
<i>Project Name/Number:</i>	<i>E09DBC2/E09DBC2</i>		

Re: Form E09DBC2, Endorsement to Limit Death Benefit

Dear Mr. Shields:

We are submitting the above referenced individual (non-group) life insurance form in final print for your approval. This is a new form which will replace E09DBC, approved 12/23/2008. The change from the previously approved form is to clarify that the limit does not override any minimum death benefit that may be required as a result of IRS Code sections 7702 and/or 7702A. The endorsement provides a cap on the death benefit under Death Benefit Option C and is displayed in the Policy specifications. The cap is generally 3 times the initial Face Amount. This filing is being submitted in Nebraska, our state of domicile, as well as all other states where Pacific Life is licensed, and where such filing is required.

The following pertain to this submission:

- The rider is to be used with all UL, VUL, and EIUL approved products, but only when Death Benefit Option C has been selected.
- Issue Ages depend on the product to which the endorsement is attached.
- Any required certification forms are included.
- Actuarial Memorandum is included.
- Readability score = 51, thus satisfying any readability requirements of your state.
- The forms will be marketed through licensed producers.
- The target release is upon approval.
- The forms will be used with primarily with application #A10IUW, approved on 8/18/2009.
- If a filing fee is required, it is handled in the usual manner.
- For those states having adopted the NAIC Model Illustration Regulation, please note that this filing is exempt from the requirements of the regulation (Illustrations Actuary's Certification, etc.) since the referenced form is an endorsement, not a policy.
- A marked-to-show-changes version of the endorsement as compared to the form being replaced is also enclosed so the changes are readily visible for your review.

To the best of my knowledge and belief this filing complies with the laws and regulations of your state. If you would like to discuss any aspect of this filing, please feel free to contact me at (800) 800-6416, extension 7081 or jill.dease@pacificlife.com.

Sincerely,

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Jill Dease
 Compliance Analyst, Life Compliance

Company and Contact

Filing Contact Information

Jill Dease, Compliance Analyst
 45 Enterprise Drive
 Aliso Viejo, CA 92656
 Jill.Klinger@pacificlife.com
 949-420-7081 [Phone]
 949-420-7424 [FAX]

Filing Company Information

Pacific Life Insurance Company
 45 Enterprise Drive
 Aliso Viejo, CA 92656
 (949) 420-7080 ext. [Phone]
 CoCode: 67466
 Group Code: 709
 Group Name:
 FEIN Number: 95-1079000
 State of Domicile: Nebraska
 Company Type:
 State ID Number:

Filing Fees

Fee Required? Yes
 Fee Amount: \$20.00
 Retaliatory? No
 Fee Explanation: \$20.00 per endorsement (if no policy is attached)
 Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Pacific Life Insurance Company	\$20.00	10/23/2009	31516699

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Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved-Closed	Linda Bird	10/27/2009	10/27/2009

<i>SERFF Tracking Number:</i>	<i>PALD-126355623</i>	<i>State:</i>	<i>Arkansas</i>
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Disposition

Disposition Date: 10/27/2009

Implementation Date:

Status: Approved-Closed

Comment:

Rate data does NOT apply to filing.

SERFF Tracking Number: PALD-126355623 *State:* Arkansas
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Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Flesch Certification		Yes
Supporting Document	Application		No
Supporting Document	Compare Document		Yes
Form	Endorsement to Limit Death Benefit		Yes

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Form Schedule

Lead Form Number: E09DBC2

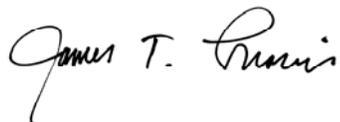
Schedule Item Status	Form Number	Form Type	Form Name	Action	Action Specific Data	Readability	Attachment
	E09DBC2	Certificate	Endorsement to Limit Revised Amendmen Death Benefit t, Insert Page, Endorseme nt or Rider		Replaced Form #: E09DBC Previous Filing #: 41163	50.000	E09DBC2.pdf

ENDORSEMENT TO LIMIT DEATH BENEFIT

This endorsement provides a maximum for the Death Benefit of the policy to which it is attached ("Policy"). The Death Benefit will not exceed the amount shown in the Policy Specifications as the "Option C Death Benefit Limit" except as described in the Death Benefit Qualification Test, Tax Qualification as Life Insurance, and Modified Endowment Contract Tax Status sections of the Policy.

All other provisions of the Policy remain unchanged.

Signed for Pacific Life Insurance Company,



Chairman, President, and Chief Executive Officer



Secretary

POLICY SPECIFICATIONS

OTHER SECTIONS OF POLICY SPECIFICATIONS

DEATH BENEFIT OPTION:	C
OPTION C DEATH BENEFIT LIMIT:	[\$1,200,000]

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Supporting Document Schedules

	Item Status:	Status Date:
Satisfied - Item: Flesch Certification		
Comments: Rule and Reg 19 and 49 do not apply to this endorsement, nor does the Consumer Information Notice. These certifications were filed with the respective policies to which this endorsement is attached.		
Attachment: Readability Certification.pdf		

	Item Status:	Status Date:
Bypassed - Item: Application		
Bypass Reason: N/A - Endorsement doesn't use an application		
Comments:		

	Item Status:	Status Date:
Satisfied - Item: Compare Document		
Comments: This document highlights the differences between form E09DBC (approved in AR on 12/23/2009; filing # 41163) and form E09DBC2 filed here for approval.		
Attachment: E09DBC2 Compare.pdf		

READABILITY CERTIFICATION

Form Filing for: **Pacific Life Insurance Company**

Policy Form Number(s): E09DBC2

Form Name(s): Endorsement to Limit Death Benefit

Flesch Score(s): 50

(Flesch test was made for entire form, not for selected samples.)

Test type: 10 point

I certify that in my judgment this filing is:

- READABLE (simple sentence structure – shortness of sentences – use of common words – avoidance of legal and technical terms to greatest possible extent and defining of those terms which cannot be avoided – minimum of cross-references).
- LEGIBLE (ample type size for text with contrasting type for headings and subheadings – ample space between lines – ample white space in margins and between section – ample ink-to-paper contrast).
- IN LOGICAL ORDER AND FORMAT (table of contents or index included – sections and subsections self-contained and arranged in logical flow – extensive use of headings and subheadings to facilitate location of particular items – outline form used where desirable for clarity).

I believe this filing:

- Meets or exceeds the requirements of the policy readability legislation already enacted in numerous states; and
- Meets or exceeds the requirements of the NAIC Model Bill on language simplification.

Signed for the Company at Newport Beach, California on

October 22, 2009



SIGNATURE

THOMAS S. BEADLESTON

NAME

VICE PRESIDENT

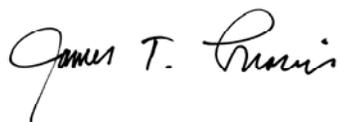
TITLE

ENDORSEMENT TO LIMIT DEATH BENEFIT

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All other provisions of the Policy remain unchanged.

Signed for Pacific Life Insurance Company,



Chairman, President, and Chief Executive Officer



Secretary

POLICY SPECIFICATIONS

OTHER SECTIONS OF POLICY SPECIFICATIONS

DEATH BENEFIT OPTION:	C
OPTION C DEATH BENEFIT LIMIT:	[\$1,200,000]