

SERFF Tracking Number: UNSA-126362164 State: Arkansas
Filing Company: USAA Life Insurance Company State Tracking Number: 43925
Company Tracking Number: AR0911951
TOI: A10 Annuities - Other Sub-TOI: A10.000 Annuities - Other
Product Name: Comparison (Replacement) Questionnaire (annuities)
Project Name/Number: Comparison (Replacement) Questionnaire (annuities) /

Filing at a Glance

Company: USAA Life Insurance Company
Product Name: Comparison (Replacement) Questionnaire (annuities)
TOI: A10 Annuities - Other
Sub-TOI: A10.000 Annuities - Other
Filing Type: Form

SERFF Tr Num: UNSA-126362164 State: Arkansas
SERFF Status: Closed-Accepted For Informational Purposes
Co Tr Num: AR0911951
Author: Susan Markey
Date Submitted: 10/28/2009

State Tr Num: 43925
State Status: Filed-Closed
Reviewer(s): Linda Bird
Disposition Date: 10/29/2009
Disposition Status: Accepted For Informational Purposes
Implementation Date:

Implementation Date Requested: 11/15/2009
State Filing Description:

General Information

Project Name: Comparison (Replacement) Questionnaire (annuities)
Project Number:
Requested Filing Mode: Review & Approval
Explanation for Combination/Other:
Submission Type: New Submission
Overall Rate Impact:
Filing Status Changed: 10/29/2009

Status of Filing in Domicile: Not Filed
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: 10/29/2009
Created By: Susan Markey
Corresponding Filing Tracking Number: UNSA-126362205

Filing Description:
Please see UNSA-126362205 for the same form filing (INFORMATIONAL) LIFE PRODUCTS.

Dear Commissioner:
Enclosed please find the above referenced form submitted for your consideration and approval.

DESCRIPTION OF THE FORM

This form will be used to comply with the Department Rule 97 which becomes effective January 1, 2010 and was

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created based on guidance from the Department under BULLETIN NO. 8-2009.

Form MDN93406AR 09-09 is similar to form MDN93406AR 08-09 that was filed and approved by the Department on September 15, 2009 (SERFF UNSA-126298157).

Changes to the form are as follows:

1. On Page 1 of 3 we revised the title of the form to "Life and Annuity Replacement Comparison Memorandum Form" so that it would clarify the type of form.
2. On Page 1 of 3 (previously page 1 of 2) we moved the 'Applicant', 'Insurer' and 'Contract No./Application No.', 'Generic Contract Type' and 'Marketing Name' data fields to the columned sections so that it is easier for the applicant to view the information side by side.
3. On Page 1 of 3 we added a footnote number to the 'Current Contract Value', 'Current Surrender Value' and 'Death Benefit Amount' data fields and the footnote to explain that the value that is going to be shown in that data field is subject to additions or subtractions as defined in the contract. We changed the asterisk to a footnote number in the 'Generic Contract Type' field and in the footnote section.
4. On Page 1 of 3, where applicable, we added '\$' signs to the actual form to assist with the understanding of what information should be populated in the data fields.
5. On Page 2 of 3 we changed 'Annual free withdrawal interest rate' to 'Annual free withdrawal percentage rate' in order to clarify that this refers to the percentage of the value that can be withdrawn.
6. On Page 2 of 3 we have added a sentence referring the applicant to go to the next page for important information.
7. On Page 3 of 3 we have added additional lines and titles to the 'Agent/Company Statement' section which now includes data field sections for 'Determination', 'Areas of Concern', 'Factors to Consider' and 'Other'.

The form will be used with the previously approved annuity product applications and contracts as identified under the Supporting Documentation tab, as well as with any contracts and applications approved by the Department in the future.

Company and Contact

Filing Contact Information

Susan Markey, Compliance Analyst Susan.Markey@usaa.com
9800 Fredericksburg Road 800-531-8000 [Phone] 87015 [Ext]
A-3-W, #00582 210-498-5081 [FAX]
San Antonio, TX 78288

Filing Company Information

USAA Life Insurance Company CoCode: 69663 State of Domicile: Texas
9800 Fredericksburg Road Group Code: 200 Company Type: Life
San Antonio, TX 78288 Group Name: State ID Number:
(800) 531-8000 ext. [Phone] FEIN Number: 74-1472662

SERFF Tracking Number: UNSA-126362164 *State:* Arkansas
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Filing Fees

Fee Required? Yes
 Fee Amount: \$50.00
 Retaliatory? No
 Fee Explanation:
 Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
USAA Life Insurance Company	\$50.00	10/28/2009	31617973

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Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Accepted For Informational Purposes	Linda Bird	10/29/2009	10/29/2009

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Disposition

Disposition Date: 10/29/2009

Implementation Date:

Status: Accepted For Informational Purposes

Comment:

Rate data does NOT apply to filing.

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Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Flesch Certification		Yes
Supporting Document	Application		No
Supporting Document	Life & Annuity - Acturial Memo		No
Supporting Document	Comparison (Red Line)		Yes
Supporting Document	Prior Approval information		Yes
Form	LIFE INSURANCE AND ANNUITIES REPLACEMENT COMPARISON MEMORANDUM		Yes

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Form Schedule

Lead Form Number:

Schedule Item Status	Form Number	Form Type	Form Name	Action	Action Specific Data	Readability	Attachment
	MDN93406 AR 09-09	Other	LIFE INSURANCE AND ANNUITIES REPLACEMENT COMPARISON MEMORANDUM	Other	Other Explanation: replacment	47.000	MDN93406A R 0909 .pdf



IF YOU RECEIVED COPIES OF THIS FORM BY PAPER MAIL OR PRINTED IT FROM USAA.COM, PLEASE: (a) Keep one copy, and (b) Sign and return a copy to: USAA Life Insurance Company, 9800 Fredericksburg Road, San Antonio, TX 78288.

Member Name: _____
 Member Number: _____
 Contract Number: _____

LIFE INSURANCE AND ANNUITIES REPLACEMENT COMPARISON MEMORANDUM

FOR BOTH LIFE INSURANCE AND ANNUITIES
(Complete all that is applicable)

CONTRACT OR POLICY PROVISION	Existing Contract/Policy	Proposed Contract/Policy
Applicant		
Insurer		
Contract/Application Number		
Generic Contract Type¹		
Marketing Name		
Initial Deposit	\$	\$
Annual Consideration	\$	\$
Current Contract Value²	\$	\$
Current Surrender Value²	\$	\$
Death Benefit Amount²	\$	\$
Current Interest Rate		
Current Interest Rate Guaranteed Period Remaining		
Minimum Guaranteed Interest Rate		
Surrender Charge Period in Years		
Surrender Charge Schedule for Remaining Years		

¹Deferred Fixed Annuity, Deferred Variable Annuity, Deferred Indexed Fixed Annuity, Immediate Annuity, Indexed Life Insurance, Variable Life Insurance, Whole Life Insurance, Universal Life Insurance, Term Life Insurance or Endowment

²The amount shown is subject to any additions or subtractions as defined in your contract.

Are Free Withdrawals Available?		
Annual Free Withdrawal Percentage Rate		
Other Significant Policy or Contract Provisions		

FOR ANNUITIES ONLY
(Complete all that is applicable)

CONTRACT PROVISION	EXISTING CONTRACT/POLICY	REPLACEMENT CONTRACT/POLICY
Initial Bonus Percentage		
Potential Loss of Bonus if Annuity is Exchanged, Surrendered or Funds Withdrawn		
Sub-Account Choices		
Guaranteed Settlement Options		

The next page contains important information about this annuity's suitability for you.

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Supporting Document Schedules

	Item Status:	Status Date:
Satisfied - Item: Flesch Certification Comments: Attachment: CERTIFICATE OF READABILITY.pdf		

	Item Status:	Status Date:
Bypassed - Item: Application Bypass Reason: Not applicable to this Comparison/Replacement form filing. Comments:		

	Item Status:	Status Date:
Satisfied - Item: Comparison (Red Line) Comments: Attached is a comparison of MDN93406AR 09-09 to the previous version MDN93406AR 08-09. Attachment: Comparison.pdf		

	Item Status:	Status Date:
Satisfied - Item: Prior Approval information Comments: Attachment: Annuity Prior Approval Information.pdf		

CERTIFICATE OF READABILITY

FORM NAME	FORM NUMBER	FLESH SCORE
LIFE INSURANCE AND ANNUITIES REPLACEMENT MEMORANDUM	MDN93406AR 09-09	47

The print is ten point type, one point leaded.

The text was Flesch scored by computer with the base contract.

I certify that to the best of my knowledge and belief, the above referenced forms meet or exceed the readability, legibility, and format requirements of any applicable laws and regulations.



Russell A. Evenson
USAA Life Insurance Company



Member Name: _____
 Member Number: _____
 Contract Number: _____

LIFE INSURANCE AND ~~ANNUITIES REPLACEMENT MEMORANDUM~~

~~EXISTING CONTRACT/POLICY~~

~~Applicant(s)~~ _____
~~Insurer~~ _____
~~Contract #~~ _____
~~Generic Contract Type*~~ _____
~~Marketing Name~~ _____

~~PROPOSED CONTRACT/POLICY~~

~~Applicant(s)~~ _____
~~Insurer~~ _____
~~Application #~~ _____
~~Generic Contract Type*~~ _____
~~Marketing Name~~ _____

~~FOR BOTH LIFE INSURANCE AND ANNUITIES~~
 (Complete all that is applicable)

CONTRACT OR POLICY PROVISION	EXISTING CONTRACT/POLICY	REPLACEMENT CONTRACT/POLICY
Initial Deposit		
Annual Consideration		
Current Contract Value		
Current Surrender Value		
Death Benefit Amount		
Current Interest Rate		
Current Interest Rate Guaranteed Period Remaining		
Minimum Guaranteed Interest Rate		

* ~~Deferred~~ Fixed Annuity, Deferred Variable Annuity, Deferred Indexed Fixed Annuity, Immediate Annuity, Indexed Life Insurance, Variable Life Insurance, Whole Life Insurance, Universal Life Insurance, Term Life Insurance or Endowment

USAA LIFE INSURANCE COMPANY 9800 Fredericksburg Road San Antonio, Texas 78288



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Member Name: _____
 Member Number: _____
 Contract Number: _____

LIFE INSURANCE AND ANNUITIES REPLACEMENT COMPARISON MEMORANDUM

FOR BOTH LIFE INSURANCE AND ANNUITIES

(Complete all that is applicable)

CONTRACT OR POLICY PROVISION	<u>Existing Contract/Policy</u>	<u>Proposed Contract/Policy</u>
<u>Applicant</u>		
<u>Insurer</u>		
<u>Contract/Application Number</u>		
<u>Generic Contract Type¹</u>		
<u>Marketing Name</u>		
<u>Initial Deposit</u>	\$	\$
<u>Annual Consideration</u>	\$	\$
<u>Current Contract Value²</u>	\$	\$
<u>Current Surrender Value²</u>	\$	\$
<u>Death Benefit Amount²</u>	\$	\$
Current Interest Rate		
Current Interest Rate Guaranteed Period Remaining		
Minimum Guaranteed Interest Rate		
<u>Surrender Charge Period in Years</u>		
<u>Surrender Charge Schedule for Remaining Years</u>		

¹Deferred Fixed Annuity, Deferred Variable Annuity, Deferred Indexed Fixed Annuity, Immediate Annuity, Indexed Life Insurance, Variable Life Insurance, Whole Life Insurance, Universal Life Insurance, Term Life Insurance or Endowment

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USAA LIFE INSURANCE COMPANY 9800 Fredericksburg Road San Antonio, Texas 78288

<u>Are Free Withdrawals Available?</u>		
<u>Annual Free Withdrawal Percentage Rate</u>		
<u>Other Significant Policy or Contract Provisions</u>		

FOR ANNUITIES ONLY
(Complete all that is applicable)

CONTRACT PROVISION	EXISTING CONTRACT/POLICY	REPLACEMENT CONTRACT/POLICY
Initial Bonus Percentage		
Potential Loss of Bonus if Annuity is Exchanged, Surrendered or Funds Withdrawn		
Sub-Account Choices		
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