

SERFF Tracking Number:	NALF-126038360	State:	Arkansas
Filing Company:	National Life Insurance Company	State Tracking Number:	42118
Company Tracking Number:	6996(0704)		
TOI:	A02I Individual Annuities- Deferred Non-Variable	Sub-TOI:	A02I.003 Single Premium
Product Name:	SPDA Liberty - Data Section		
Project Name/Number:	SPDA Liberty - Data Section/6996(0704)		

Filing at a Glance

Company: National Life Insurance Company

Product Name: SPDA Liberty - Data Section

TOI: A02I Individual Annuities- Deferred Non-Variable

Sub-TOI: A02I.003 Single Premium

Filing Type: Form

SERFF Tr Num: NALF-126038360 State: Arkansas

SERFF Status: Closed-Approved-Closed State Tr Num: 42118

Co Tr Num: 6996(0704)

State Status: Approved-Closed

Reviewer(s): Linda Bird

Authors: Susan Carey, Laurie

Disposition Date: 04/21/2009

Trombly, Michelle Goodwin, Susan

Preedom

Date Submitted: 04/16/2009

Disposition Status: Approved-Closed

Implementation Date:

Implementation Date Requested: On Approval
State Filing Description:

General Information

Project Name: SPDA Liberty - Data Section

Project Number: 6996(0704)

Requested Filing Mode: Review & Approval

Explanation for Combination/Other:

Submission Type: New Submission

Overall Rate Impact:

Filing Status Changed: 04/21/2009

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: 04/21/2009

Created By: Michelle Goodwin

Corresponding Filing Tracking Number:

Deemer Date:

Submitted By: Michelle Goodwin

Filing Description:

Today we submit for your approval revised Data Sections for the above-referenced Single Premium Deferred Annuity contracts. The Data Sections have been updated in order to allow that the initial credited interest rate be guaranteed for the first five years of the contract. Currently the initial credited interest rate is guaranteed for only one year.

Company and Contact

<i>SERFF Tracking Number:</i>	<i>NALF-126038360</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>National Life Insurance Company</i>	<i>State Tracking Number:</i>	<i>42118</i>
<i>Company Tracking Number:</i>	<i>6996(0704)</i>		
<i>TOI:</i>	<i>A021 Individual Annuities- Deferred Non-Variable</i>	<i>Sub-TOI:</i>	<i>A021.003 Single Premium</i>
<i>Product Name:</i>	<i>SPDA Liberty - Data Section</i>		
<i>Project Name/Number:</i>	<i>SPDA Liberty - Data Section/6996(0704)</i>		

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved-Closed	Linda Bird	04/21/2009	04/21/2009

SERFF Tracking Number: NALF-126038360 *State:* Arkansas
Filing Company: National Life Insurance Company *State Tracking Number:* 42118
Company Tracking Number: 6996(0704)
TOI: A021 Individual Annuities- Deferred Non- *Sub-TOI:* A021.003 Single Premium
Variable
Product Name: SPDA Liberty - Data Section
Project Name/Number: SPDA Liberty - Data Section/6996(0704)

Disposition

Disposition Date: 04/21/2009

Implementation Date:

Status: Approved-Closed

Comment:

Rate data does NOT apply to filing.

SERFF Tracking Number: NALF-126038360 *State:* Arkansas
Filing Company: National Life Insurance Company *State Tracking Number:* 42118
Company Tracking Number: 6996(0704)
TOI: A021 Individual Annuities- Deferred Non-Variable *Sub-TOI:* A021.003 Single Premium
Product Name: SPDA Liberty - Data Section
Project Name/Number: SPDA Liberty - Data Section/6996(0704)

Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Flesch Certification	No	No
Supporting Document	Application	No	No
Supporting Document	Life & Annuity - Acturial Memo	No	No
Supporting Document	Cover Letter	Yes	Yes
Form	Data Page - Sex Distinct	Yes	Yes
Form	Data Page - Unisex	Yes	Yes

SERFF Tracking Number: NALF-126038360 State: Arkansas
 Filing Company: National Life Insurance Company State Tracking Number: 42118
 Company Tracking Number: 6996(0704)
 TOI: A021 Individual Annuities- Deferred Non- Sub-TOI: A021.003 Single Premium
 Variable
 Product Name: SPDA Liberty - Data Section
 Project Name/Number: SPDA Liberty - Data Section/6996(0704)

Form Schedule

Lead Form Number: 6996(0704)

Schedule Item Status	Form Number	Form Type	Form Name	Action	Action Specific Data	Readability	Attachment
		Data/Declaration Pages	Data Page - Sex Distinct	Initial			Liberty DataPageSex D.pdf
		Data/Declaration Pages	Data Page - Unisex	Initial			Liberty DataPageUni sex.pdf

(who code/agency #)

DATA SECTION

CONTRACT NUMBER: [NL1234567]

DATE OF ISSUE: [MAY 01, 2009]

ANNUITANT: [ETHAN ALLEN]

GUARANTEED

ISSUE AGE OF THE ANNUITANT: [35]

INCOME PAYMENT*: [\$ 81.66]

[CONTINGENT ANNUITANT: MAE ALLEN]

[ISSUE AGE OF THE CONTINGENT ANNUITANT: 35]

OWNER: [ETHAN ALLEN]

BENEFICIARY: AS STATED IN THE APPLICATION UNLESS LATER CHANGED

*THIS INCOME WILL BE PAYABLE MONTHLY FOR 120 MONTHS AND MONTHLY THEREAFTER FOR THE LIFE OF THE NAMED ANNUITANT IF THE SINGLE PREMIUM SET FORTH IN THIS SECTION IS PAID ON THE DATE OF ISSUE, PAYMENT OPTION 3 BECOMES OPERATIONAL, AND THE NAMED ANNUITANT IS THE CHOSEN HUMAN BEING. INCOME PAYMENTS START ON THE MATURITY DATE. DIFFERENT CIRCUMSTANCES WILL RESULT IN A DIFFERENT INCOME PAYMENT.

SINGLE PREMIUM PAYABLE ON THE DATE OF ISSUE: [\$10,000]

MATURITY DATE: [May 01, 2039]

CONTRACT YEARS	MINIMUM GUARANTEED INTEREST RATE
1 - 5	[5.00]
6 AND LATER	[1.25]%

DURING CONTRACT YEAR	WITHDRAWAL CHARGE PERCENTAGE
1	8.5%
2	7.5
3	6.5
4	6.0
5	5.0
6	4.0
7	3.0
8	2.0
9	1.0
10 AND LATER	0.0

LBTY [NL1234567]

DATA SECTION

THE TABLE BELOW, SHOWING THE CONTRACT VALUES AND THE CASH SURRENDER VALUES, ASSUMES THE FOLLOWING:

THE SINGLE PREMIUM SET FORTH IN THIS DATA SECTION IS PAID ON THE DATE OF ISSUE; AND
 THE STATE PREMIUM TAX IS 0.00%; AND
 THE MINIMUM GUARANTEED INTEREST RATE IS CREDITED; AND
 NO WITHDRAWALS ARE MADE; AND
 EQUAL INCOME PAYMENTS ARE MADE MONTHLY FOR 120 MONTHS AND MONTHLY THEREAFTER DURING THE LIFE OF THE NAMED ANNUITANT; AND
 THE FIRST INCOME PAYMENT IS MADE ON THE MATURITY DATE SET FORTH IN THIS DATA SECTION .

LAST DAY OF CONTRACT YEAR	CONTRACT VALUE	CASH SURRENDER VALUE
1	[\$ 10,500.00	\$ 9,650.00
2	11,025.00	10,275.00
3	11,576.25	10,926.25
4	12,155.06	11,555.06
5	12,762.82	12,262.82
6	12,922.35	12,522.35
7	13,083.88	12,783.88
8	13,247.43	13,047.43
9	13,413.02	13,313.02
10	13,580.68	13,580.68
11	13,750.44	13,750.44
12	13,922.32	13,922.32
13	14,096.35	14,096.35
14	14,272.56	14,272.56
15	14,450.96	14,450.96
16	14,631.60	14,631.60
17	14,814.50	14,814.50
18	14,999.68	14,999.68
19	15,187.17	15,187.17
20	15,377.01	15,377.01]
[25	16,362.40	16,362.40]
[30	17,410.94	17,410.94]

ON THE MATURITY DATE THE CASH SURRENDER VALUE IS [\$ 17,410.94] AND THE PAID UP ANNUITY WILL PROVIDE FOR GUARANTEED INCOME PAYMENTS OF [\$ 81.66].

NATIONAL LIFE INSURANCE COMPANY
MONTPELIER, VERMONT 05604
INDIVIDUAL RETIREMENT ANNUITY DISCLOSURE STATEMENT
SINGLE PREMIUM DEFERRED ANNUITY (SPDA)

YOU MAY RETURN YOUR CONTRACT AT ANY TIME WITHIN 10 DAYS AFTER YOU RECEIVE IT BY DELIVERING IT OR MAILING IT TO NATIONAL LIFE INSURANCE COMPANY, MONTPELIER, VERMONT 05604. IMMEDIATELY UPON SUCH RETURN, THE CONTRACT SHALL BE DEEMED VOID AS OF ITS DATE OF ISSUE AND ANY PREMIUMS PAID ON IT WILL BE REFUNDED. YOU MAY NOTIFY US BY TELEPHONE WITHIN SAID 10 DAYS OF YOUR DESIRE TO RETURN THE CONTRACT BY CALLING (800)732-8939.

THE LAW AND REGULATIONS CONCERNING INDIVIDUAL RETIREMENT SAVINGS PROGRAMS REQUIRE THE INSURER OF AN INDIVIDUAL RETIREMENT ANNUITY (IRA) TO FURNISH THE INDIVIDUAL WITH A DISCLOSURE STATEMENT. AS INSURER OF THIS IRA, THIS COMPANY HEREBY DISCLOSES THE FOLLOWING INFORMATION:

FOR A \$1,000.00 ANNUITY CONTRIBUTION PAID ON THE FIRST DAY OF THE FIRST CONTRACT YEAR, THE GUARANTEED CONTRACT VALUE AND THE CASH SURRENDER VALUES ARE GIVEN IN THE CHART BELOW.

LAST DAY OF CONTRACT YEAR	CONTRACT VALUE	CASH SURRENDER VALUE	LAST DAY OF CONTRACT YEAR	CONTRACT VALUE	CASH SURRENDER VALUE
1	[1050.00	956.00	11	1375.04	1375.04
2	1102.50	1027.50	12	1392.23	1392.23
3	1157.63	1092.63	13	1409.64	1409.64
4	1215.51	1155.51	14	1427.26	1427.26
5	1276.28	1226.28	15	1455.10	1455.10
6	1292.24	1252.24	16	1463.16	1463.16
7	1308.39	1278.39	17	1481.45	1481.45
8	1324.74	1304.74	18	1499.97	1499.97
9	1341.30	1331.30	19	1518.72	1518.72
10	1358.07	1358.07	20	1537.70	1537.70]
			AT AGE 65	[1741.09	1741.09
			AT AGE 70	1852.67	1852.67]

THE VALUES ARE BASED ON A GUARANTEED INTEREST RATE OF [5.00%] FOR THE FIRST FIVE YEARS AND [1.25%] THEREAFTER.

REGARDLESS OF THE MATURITY DATE OF THIS CONTRACT, THE (IRA) LAW REQUIRES THAT DISTRIBUTIONS BEGIN BY AGE 70 1/2.

ATTACHED AS PART OF THIS DISCLOSURE IS AN IRS PUBLICATION WHICH WE URGE YOU TO READ AND RETAIN.

THE INTERNAL REVENUE SERVICE HAS DETERMINED THAT THE PROVISIONS OF THIS CONTRACT SATISFY THE IRA REQUIREMENTS. SUCH INTERNAL REVENUE SERVICE APPROVAL IS BASED ON THE FORM OF THE CONTRACT ONLY AND DOES NOT REPRESENT A RULING WITH REGARD TO ANY PARTICULAR INDIVIDUAL RETIREMENT ARRANGEMENT.

LBTY [NL1234567]

DATA SECTION

(who code/agency #)

CONTRACT NUMBER: [NL1234567]

DATE OF ISSUE: [MAY 01, 2009]

ANNUITANT: [ETHAN ALLEN]

GUARANTEED

ISSUE AGE OF THE ANNUITANT: [35]

INCOME PAYMENT*: [\$ 77.30]

[CONTINGENT ANNUITANT: MAE ALLEN]

[ISSUE AGE OF THE CONTINGENT ANNUITANT: 35]

OWNER: [ETHAN ALLEN]

BENEFICIARY: AS STATED IN THE APPLICATION UNLESS LATER CHANGED

*THIS INCOME WILL BE PAYABLE MONTHLY FOR 120 MONTHS AND MONTHLY THEREAFTER FOR THE LIFE OF THE NAMED ANNUITANT IF THE SINGLE PREMIUM SET FORTH IN THIS SECTION IS PAID ON THE DATE OF ISSUE, PAYMENT OPTION 3 BECOMES OPERATIONAL, AND THE NAMED ANNUITANT IS THE CHOSEN HUMAN BEING. INCOME PAYMENTS START ON THE MATURITY DATE. DIFFERENT CIRCUMSTANCES WILL RESULT IN A DIFFERENT INCOME PAYMENT.

SINGLE PREMIUM PAYABLE ON THE DATE OF ISSUE: [\$ 10,000.00]

MATURITY DATE: [May 01, 2039]

CONTRACT YEARS	MINIMUM GUARANTEED INTEREST RATE
1 - 5	[5.00]%
6 AND LATER	[1.25]%

DURING CONTRACT YEAR	WITHDRAWAL CHARGE PERCENTAGE
1	8.5%
2	7.5
3	6.5
4	6.0
5	5.0
6	4.0
7	3.0
8	2.0
9	1.0
10 AND LATER	0.0

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MONTPELIER, VERMONT 05604
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FOR A \$1,000.00 ANNUITY CONTRIBUTION PAID ON THE FIRST DAY OF THE FIRST CONTRACT YEAR, THE GUARANTEED CONTRACT VALUE AND THE CASH SURRENDER VALUES ARE GIVEN IN THE CHART BELOW.

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			AT AGE 65	[1741.09	1741.09
			AT AGE 70	1852.67	1852.67]

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REGARDLESS OF THE MATURITY DATE OF THIS CONTRACT, THE (IRA) LAW REQUIRES THAT DISTRIBUTIONS BEGIN BY AGE 70 1/2.

ATTACHED AS PART OF THIS DISCLOSURE IS AN IRS PUBLICATION WHICH WE URGE YOU TO READ AND RETAIN.

THE INTERNAL REVENUE SERVICE HAS DETERMINED THAT THE PROVISIONS OF THIS CONTRACT SATISFY THE IRA REQUIREMENTS. SUCH INTERNAL REVENUE SERVICE APPROVAL IS BASED ON THE FORM OF THE CONTRACT ONLY AND DOES NOT REPRESENT A RULING WITH REGARD TO ANY PARTICULAR INDIVIDUAL RETIREMENT ARRANGEMENT.

LBTY/U [NL1234567]



April 16, 2009

Director, Life & Health Division
Department of Insurance
1200 West Third Street
Little Rock, Arkansas 72201-1904

RE: **Minimum Guaranteed Accumulation Interest Rate
Single Premium Deferred Annuity**

National Life Insurance Company
NAIC No. 0634-66680
FEIN No. 03-0144090

Impacted Forms: **Data Sections for:**
6996(0704), Single Premium Deferred Annuity. Sex Distinct.
6997(0704), Single Premium Deferred Annuity. Unisex Version.

Today we submit for your approval revised Data Sections for the above-referenced Single Premium Deferred Annuity contracts. The Data Sections have been updated in order to allow that the initial credited interest rate be guaranteed for the first five years of the contract. Currently the initial credited interest rate is guaranteed for only one year. The proposed effective date for the revised Data Sections is July 1, 2009.

The revised Data Sections were previously approved with forms 6996(0704) and 6997(0704) on August 8, 2005.

Also included with this submission are the following materials:

- Actuarial Memorandum in support of the submitted Data Sections.
- Any required Certifications or Checklists.
- Any filing fees, if applicable.

We appreciate your consideration of this submission. If you have any questions regarding this submission, I may be reached by telephone (collect) at 802/229-7441, by E-mail at MGoodwin@NationalLife.com, or by Fax at 802/229-3743.

Sincerely,
Michelle Goodwin
Michelle Goodwin
Policy Forms Analyst