

SERFF Tracking Number: PRUD-126116205 State: Arkansas  
Filing Company: Allstate Life Insurance Company State Tracking Number: 42225  
Company Tracking Number: 90% ALLSTATE  
TOI: A02.11 Individual Annuities- Deferred Non- Sub-TOI: A02.11.002 Flexible Premium  
Variable and Variable  
Product Name: 90% Allstate  
Project Name/Number: 90% Allstate/90% Allstate

## Filing at a Glance

Company: Allstate Life Insurance Company

Product Name: 90% Allstate

SERFF Tr Num: PRUD-126116205 State: Arkansas

TOI: A02.11 Individual Annuities- Deferred Non-  
Variable and Variable

SERFF Status: Closed-Approved-  
Closed State Tr Num: 42225

Sub-TOI: A02.11.002 Flexible Premium

Co Tr Num: 90% ALLSTATE

State Status: Approved-Closed

Filing Type: Form

Reviewer(s): Linda Bird

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

Disposition Date: 05/04/2009

Date Submitted: 04/27/2009

Disposition Status: Approved-  
Closed

Implementation Date Requested: On Approval

Implementation Date:

State Filing Description:

## General Information

Project Name: 90% Allstate

Status of Filing in Domicile: Pending

Project Number: 90% Allstate

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: 05/04/2009

Explanation for Other Group Market Type:

State Status Changed: 05/04/2009

Deemer Date:

Created By: Pamela Bonaparte-Golding

Submitted By: Pamela Bonaparte-Golding

Corresponding Filing Tracking Number:

Filing Description:

VIA SERFF

April 27, 2009

Honorable Julia Benafield Bowman

Insurance Commissioner

SERFF Tracking Number: PRUD-126116205 State: Arkansas  
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Product Name: 90% Allstate  
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Life and Health Division  
Arkansas Insurance Department  
1200 West Third Street  
Little Rock, AR 72201

Attn: Claudia Meeks, Rates and Form Filings

RE: Allstate Life Insurance Company ("Allstate," "we," "us")  
NAIC #79227 FEIN # 22-1944557

Forms Submitted for Approval:

Schedule Supplement Form A-SCH-HD7(4/09) For use with Rider Form A-RID-HD7(4/08) Approved on February 25, 2008

Schedule Supplement Form A-SCH-HDLT(4/09) For use with Rider Form A-RID-HDLT(7/07) Approved on September 5, 2007, File No. PRUD-125265035 and A-RID-HDLT(3/07) Approved on March 14, 2007

Dear Ms. Meeks:

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

The purpose of this form is to permit annuity owners that have an existing guaranteed living benefit rider to elect the terms contained in the referenced schedule pages without canceling the guarantees provided by the existing benefit. The main difference in the referenced schedule pages and the prior approved schedule pages is the Benefit Transfer Formula (a transfer formula used to monitor investment performance and move funds between the investment options selected by the annuity holder and a transfer account to mitigate the risks borne by the company associated with the optional rider's guarantees) is adjusted to place a 90% cap on transfers of the account value to the Benefit Transfer Account. Another difference is an "Effective Date of the 90% Cap Rule" item has been added to indicate the effective date.

The annuity forms submitted are designed for use for qualified and non-qualified sales, as defined in the Internal Revenue Code. Should this Rider be used with certain qualified sales described under the Internal Revenue Code, the appropriate endorsement approved or accepted by your Department, will be provided to the annuity holder and will be made part of the annuity to satisfy any federal qualified usage requirements.

Any brackets in the Schedule Supplements indicate that we reserve the right to change the information shown within

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Variable and Variable  
Product Name: 90% Allstate  
Project Name/Number: 90% Allstate/90% Allstate

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.

Arkansas Department of Insurance

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Please note that actuarial memorandums, and any related material, are enclosed with this submission. These actuarial memorandums are annuity product-specific. Any certifications or other materials Allstate believes you require are also enclosed. Allstate believes that federal law exempts these forms from any "Flesch score" or readability requirements in your statutes or regulations. Unless otherwise informed, Allstate reserves the right to alter the pagination, layout, including sequential order, color, and typeface of these forms. Allstate 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  
Phone: (203) 944-7544  
Email: Pamela.Bonaparte-Golding@prudential.com  
Fax: (203) 944-7737

Enclosures

## Company and Contact

### Filing Contact Information

Anthony Pereira, Senior Compliance Analyst Anthony.Pereira@Prudential.com  
One Corporate Drive 800-628-6039 [Phone] 57146 [Ext]  
P.O. Box 883 203-944-7510 [FAX]  
Shelton, CT 06484



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Variable and Variable  
Product Name: 90% Allstate  
Project Name/Number: 90% Allstate/90% Allstate

## Correspondence Summary

### Dispositions

Status	Created By	Created On	Date Submitted
Approved- Closed	Linda Bird	05/04/2009	05/04/2009

*SERFF Tracking Number:* PRUD-126116205      *State:* Arkansas  
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Variable and Variable  
*Product Name:* 90% Allstate  
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## **Disposition**

Disposition Date: 05/04/2009

Implementation Date:

Status: Approved-Closed

Comment:

Rate data does NOT apply to filing.

SERFF Tracking Number: PRUD-126116205 State: Arkansas  
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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
Supporting Document	Third Party Authorization	Yes	Yes
Supporting Document	Memo of Variability A-SCH-HDLT(4/09)	Yes	Yes
Supporting Document	Memo of Variability A-SCH-HD7(4/09)	Yes	Yes
Supporting Document	AR Fee Form	Yes	Yes
Supporting Document	AR Cert of Compliance	Yes	Yes
Form	TRUEINCOME - HIGHEST DAILY 7 BENEFIT	Yes	Yes
Form	TRUEINCOME - HIGHEST DAILY BENEFIT SCHEDULE SUPPLEMENT	Yes	Yes

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## Form Schedule

### Lead Form Number: A-SCH-HD7(4/09)

Schedule Item Status	Form Number	Form Type Form Name	Action	Action Specific Data	Readability	Attachment
	A-SCH-HD7(4/09)	Policy/Contract/Fraternal BENEFIT TRUEINCOME - HIGHEST DAILY Certificate: Amendment, Insert Page, Endorsement or Rider	Initial		0.000	A-SCH-HD7_4-09_.pdf
	A-SCH-HDLT(4/09)	Policy/Contract/Fraternal BENEFIT TRUEINCOME - HIGHEST DAILY Certificate: SCHEDULE Amendment SUPPLEMENT t, Insert Page, Endorsement or Rider	Initial		0.000	A-SCH-HDLT_4-09_.pdf

**ALLSTATE LIFE INSURANCE COMPANY  
[3100 SANDERS ROAD  
NORTHBROOK, IL 60062]**

**[TRUEINCOME - HIGHEST DAILY 7] BENEFIT  
SCHEDULE SUPPLEMENT**

**ANNUITY NUMBER:** [001-0001]

**EFFECTIVE DATE:** [Issue Date of the Annuity]

**EFFECTIVE DATE OF [90%] CAP RULE:** [Issue Date of Schedule Supplement]

**[[SPOUSAL] DESIGNATED LIFE/LIVES]:**

[John Doe]  
[[Mary Doe]

**DATE OF BIRTH:** [February 21, 1945]  
**DATE OF BIRTH:** [January 1, 1946]

**ROLL-UP RATE:** [7.0% per year]

**ANNUAL INCOME PERCENTAGE:**

<b>[Attained Age of Single Designated Life</b>	<b>Annual Income Percentage</b>	<b>Attained Age of Younger Spousal Designated Life</b>	<b>Annual Income Percentage</b>
Less than 75	5%	Less than 80	5%
75 - 79	6%	80 - 84	6%
80 - 84	7%	85 - 89	7%
85 or more	8%	90 or more	8%

**MINIMUM GUARANTEE PAYMENT:** [\$100]

**TRANSFER ACCOUNT:** [AST Investment Grade Bond Portfolio]. If this portfolio is discontinued, we will substitute a successor portfolio, if there is one. Otherwise, we will substitute a comparable portfolio. We will obtain any required regulatory approvals prior to substitution of the portfolio.

**CHARGE FOR THE RIDER:** [You have elected this Rider on a [Single Designated Life] basis. Therefore the charge for the Rider is an annual rate of [0.60]%].

**ANNUITY PAYMENT TABLE:** [The Annuity Payment Table below is used to compute the minimum annual amount of a single life annuity payment with 10 payments certain per \$1,000 applied. We used the Annuity 2000 Valuation Mortality Table, less two years, with projected mortality improvements (modified scale G), with an interest rate of [3]% per year in preparing the Annuity Payment Table.

**Single Life Annuity Payment with 10 Payments Certain**

<b>Age</b>	<b>Male</b>	<b>Female</b>	<b>Age</b>	<b>Male</b>	<b>Female</b>
55	48.68	45.60	80	87.48	83.01
60	53.45	49.71	85	97.52	94.84
65	59.66	55.11	90	105.41	104.20
70	67.55	62.27	95	110.53	109.94
75	77.02	71.62			

**[TRUEINCOME - HIGHEST DAILY 7] BENEFIT  
SCHEDULE SUPPLEMENT (CONTINUED)**

The Annuity Payment Table below is used to compute the minimum annual amount of a joint and last survivor life annuity payment with 10 payments certain per \$1,000 applied. We used Annuity 2000 Valuation Mortality Table, less two years, with projected mortality improvements (modified scale G), and an interest rate of [3]% per year in preparing the Annuity Payment Table.

**Joint and Last Survivor Life Annuity Payment with 10 Payments Certain**

		Female Age								
		55	60	65	70	75	80	85	90	95
Male Age:	55	42.00	43.62	45.09	46.32	47.26	47.92	48.33	48.54	48.63
	60	43.07	45.24	47.37	49.31	50.90	52.06	52.79	53.18	53.36
	65	43.93	46.65	49.56	52.43	55.01	57.03	58.39	59.14	59.48
	70	44.57	47.77	51.45	55.41	59.32	62.69	65.11	66.52	67.20
	75	45.00	48.58	52.91	57.94	63.37	68.52	72.56	75.07	76.33
	80	45.29	49.11	53.92	59.84	66.72	73.86	79.99	84.06	86.23
	85	45.45	49.42	54.54	61.07	69.10	78.04	86.32	92.22	95.52
	90	45.54	49.59	54.88	61.76	70.52	80.75	90.76	98.26	102.64
	95	45.58	49.67	55.04	62.10	71.25	82.23	93.36	101.97	107.14

For purposes of determining annuity payments using the above Annuity Payment Tables, we use the Annuitant's(s') Adjusted Age and Sex. The Adjusted Age is the age last birthday prior to the date on which the first Annuity Payment is due, adjusted as shown in the "Translation of Adjusted Age Table" below.

**Translation of Adjusted Age Table**

Calendar Year in Which First Payment is Due	Adjusted Age	Calendar Year in Which First Payment is Due	Adjusted Age
Prior to 2010	Actual Age	2050 through 2059	Actual Age minus 5
2010 through 2019	Actual Age minus 1	2060 through 2069	Actual Age minus 6
2020 through 2029	Actual Age minus 2	2070 through 2079	Actual Age minus 7
2030 through 2039	Actual Age minus 3	2080 through 2089	Actual Age minus 8
2040 through 2049	Actual Age minus 4	2090 through 2099	Actual Age minus 9]

**[TRUEINCOME - HIGHEST DAILY 7] BENEFIT  
SCHEDULE SUPPLEMENT (CONTINUED)**

**TRANSFER CALCULATION FORMULA**

**The following are the Terms and Definitions referenced in the Transfer Calculation**

**Formula:**

- o  $C_u$  the upper target is established on the Effective Date and is not changed for the life of the guarantee.
- o  $C_t$  the target is established on the Effective Date and is not changed for the life of the guarantee.
- o  $C_l$  the lower target is established on the Effective Date and is not changed for the life of the guarantee.
- o  $L$  the target value as of the current Valuation Day.
- o  $r$  the target ratio.
- o  $a$  the factors used in calculating the target value. These factors are established on the Effective Date and are not changed for the life of the guarantee.
- o  $V$  the total value of all elected Sub-accounts in the Annuity.
- o  $B$  the total value of all Transfer Account allocations.
- o  $P$  the Income Basis. Prior to the first withdrawal, the Income Basis is equal to the Protected Withdrawal Value calculated as if the first withdrawal were taken on the date of calculation. After the first withdrawal, the Income Basis equals the greatest of (1) the Account Value on the date of calculation; (2) the Protected Withdrawal Value on the date of the first withdrawal after the Effective Date, increased for subsequent additional Adjusted Purchase Payments and adjusted proportionally for Excess Income; or (3) the highest quarterly Account Value prior to the date of calculation.
- o  $T$  the amount of a transfer into or out of the Transfer Account.

**Target Value Calculation:**

On each Valuation Day, a target value ( $L$ ) is calculated, according to the following formula. Target values are subject to change for new elections of the Rider on a going-forward basis.

$$L = 0.05 * P * a$$

**Transfer Calculation:**

The following formula, which is set on the Effective Date of the 90% Cap Rule as shown in this Schedule Supplement and is not changed for the life of the guarantee, determines when a transfer is required. On the Effective Date of the 90% Cap Rule (and only on this date), the following asset transfer calculation is performed to determine the amount of Account Value allocated to the Transfer Account:

$$\text{If } (B/(V + B) > .90) \text{ then} \\ T = B - [(V + B) * .90]$$

If  $T$  is greater than \$0 as described above, then no additional transfer calculations are performed on the Effective Date of the 90% Cap Rule. Any transfers into the Transfer Account are suspended. The suspension will be lifted once a transfer out of the Transfer Account occurs.

On each Valuation Day thereafter (including the Effective Date of the 90% Cap Rule, provided  $B/(V+B) \leq .90$ ), the following asset transfer calculation is performed:

$$\text{Target Ratio } r = (L - B)/V$$

. If  $r > C_u$ , assets in the elected Sub-accounts are transferred to the Transfer Account provided transfers are not suspended under the 90% Cap Rule described below.

**[TRUEINCOME - HIGHEST DAILY 7] BENEFIT  
SCHEDULE SUPPLEMENT (CONTINUED)**

- . If  $r < C_i$  and there are currently assets in the Transfer Account ( $B > 0$ ), assets in the Transfer Account are transferred to the elected Sub-accounts according to most recent allocation instructions.

The following formula, which is set on the Effective Date of the 90% Cap Rule and is not changed for the life of the guarantee, determines the transfer amount:

$T = \text{Min} (\text{MAX} (0, (0.90 * (V+B)) - B), [L - B - V * C_i] / (1 - C_i))$       Money is transferred from the elected Sub-accounts to Transfer Account

$T = \{\text{Min} (B, -[L - B - V * C_i] / (1 - C_i))\}$       Money is transferred from the Transfer Account to the elected Sub-accounts.

At any given time, some, most, or none of the Account Value may be allocated to the Transfer Account under the Transfer Calculation formula.

**[90%] Cap Rule:** If, on any Valuation Day, on and after the Effective Date of the 90% Cap Rule, a transfer into the Transfer Account occurs which results in 90% of the Account Value being allocated to the Transfer Account, any transfers into the Transfer Account will be suspended, even if the formula would otherwise dictate that a transfer into the Transfer Account should occur. Transfers out of the Transfer Account and into the elected Sub-accounts will still be allowed. The suspension will be lifted once a transfer out of the Transfer Account occurs. Due to the performance of the Transfer Account and the elected Sub-Accounts, the Account Value could be more than 90% invested in the Transfer Account.]

ALLSTATE LIFE INSURANCE COMPANY  
[3100 SANDERS ROAD  
NORTHBROOK, IL 60062]

[TRUEINCOME - HIGHEST DAILY BENEFIT]  
SCHEDULE SUPPLEMENT

**Annuity Number:** [XXXXXX]

**Effective Date of the Rider:** [Issue Date of the Annuity]

**Effective Date of [90%] Cap Rule:** [Issue Date of Schedule Supplement]

**[[Spousal] Designated Life/Lives]:**

[John Doe]      **Date of Birth:** [February 21, 1955]  
[[Mary Doe]      **Date of Birth:** [January 1, 1956]]

**Roll-Up Rate:** [5.0% per year]

**Annual Income Percentage:** [[5.0%]

[The Annual Income Amount is determined at the time of the first withdrawal after the Effective Date and on a Designated Life's age at the time of the first withdrawal. It is equal to an Annual Income Percentage, as shown below, applied against the Protected Withdrawal Value. For Spousal Designated Lives, the percentage is based on the youngest Designated Life's age at the time of the first withdrawal.

Age of Designated Life	Annual Income Percentage Applied Against Protected Withdrawal Value
50 – 64	4%
65 – 74	5%
75 – 84	6%
85+	7%

]]

**Minimum Guaranteed Payment:** [\$100]

**Charge for the Rider:** [The daily equivalent of an annual rate applied to Sub-accounts:

[For Single Designated Life: [0.60]%

[For Spousal Designated Lives: [0.75]%

**Interest Rate Minimum:** [[2.0]% annually for crediting periods that start prior to the [tenth] anniversary of the [Annuity's Issue Date]; [3.0]% annually for crediting periods that start on or after the [tenth] anniversary of the [Annuity's Issue Date]]

**[TRUEINCOME - HIGHEST DAILY BENEFIT] SCHEDULE SUPPLEMENT (CONTINUED)**

**Annuity Payment Table:** [The Annuity Payment Table below is used to compute the minimum annual amount of a single life annuity payment with 10 payments certain per \$1,000 applied. We used the Annuity 2000 Valuation Mortality Table, less two years, with projected mortality improvements (modified scale G), with an interest rate of [3]% per year in preparing the Annuity Payment Table.

**Single Life Annuity Payment with 10 Payments Certain**

AGE	MALE	FEMALE	AGE	MALE	FEMALE
55	48.68	45.60	80	87.48	83.01
60	53.45	49.71	85	97.52	94.84
65	59.66	55.11	90	105.41	104.20
70	67.55	62.27	95	110.53	109.94
75	77.02	71.62			

The Annuity Payment Table below is used to compute the minimum annual amount of a joint and last survivor life annuity payment with 10 payments certain per \$1,000 applied. We used Annuity 2000 Valuation Mortality Table, less two years, with projected mortality improvements (modified scale G), and an interest rate of [3]% per year in preparing the Annuity Payment Table.

**Joint and Last Survivor Life Annuity Payment with 10 Payments Certain**

**Female Age**

	55	60	65	70	75	80	85	90	95
55	42.00	43.62	45.09	46.32	47.26	47.92	48.33	48.54	48.63
60	43.07	45.24	47.37	49.31	50.90	52.06	52.79	53.18	53.36
65	43.93	46.65	49.56	52.43	55.01	57.03	58.39	59.14	59.48
70	44.57	47.77	51.45	55.41	59.32	62.69	65.11	66.52	67.20
75	45.00	48.58	52.91	57.94	63.37	68.52	72.56	75.07	76.33
80	45.29	49.11	53.92	59.84	66.72	73.86	79.99	84.06	86.23
85	45.45	49.42	54.54	61.07	69.10	78.04	86.32	92.22	95.52
90	45.54	49.59	54.88	61.76	70.52	80.75	90.76	98.26	102.64
95	45.58	49.67	55.04	62.10	71.25	82.23	93.36	101.97	107.14

## [TRUEINCOME - HIGHEST DAILY BENEFIT] SCHEDULE SUPPLEMENT (CONTINUED)

The factors in the Annuity Payment Tables are based on the Annuitant's(s') Adjusted Age and Sex. The Adjusted Age is the age last birthday prior to the date on which the first Annuity Payment is due, adjusted as shown in the "Translation of Adjusted Age Table" below.

### Translation of Adjusted Age Table

Calendar Year in Which First Payment is Due	Adjusted Age	Calendar Year in Which First Payment is Due	Adjusted Age
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2040 through 2049	Actual Age minus 4	2090 through 2099	Actual Age minus 9]

### ADDITIONAL INFORMATION ABOUT TRANSFERS BETWEEN THE SUB-ACCOUNTS AND THE BENEFIT FIXED RATE ACCOUNT

[The program described in the Rider monitors your Account Value daily, and, as determined by the formula set forth below, transfers are made between the Sub-accounts and the Benefit Fixed Rate Account. At any given time, some, most, or none of the Account Value may be allocated to the Benefit Fixed Rate Account under the formula.

Any transfers out of the Sub-accounts into the Benefit Fixed Rate Account are made on a pro rata basis. Any transfers out of the Benefit Fixed Rate Account are taken out of the Benefit Fixed Rate Account on a last-in, first-out basis. Such transfer amounts are deposited into the Sub-accounts on a pro rata basis, unless you instruct us otherwise.

### Terms and Definitions referenced in the calculation formula:

- o  $C_u$  – the upper target is established on the Effective Date and is not changed for the life of the guarantee.
- o  $C_t$  – the target is established on the Effective Date and is not changed for the life of the guarantee.
- o  $C_l$  – the lower target is established on the Effective Date and is not changed for the life of the guarantee.
- o  $L$  – the target value as of the current Valuation Day.
- o  $r$  – the target ratio.
- o  $a$  – the factors used in calculating the target value. These factors are established on the Effective Date and are not changed for the life of the guarantee.
- o  $Q$  – age based factors used in calculating the target value. These factors are established on the Effective Date and are not changed for the life of the guarantee.
- o  $V$  – the total value of all Sub-accounts in the Annuity.
- o  $F$  – the total value of all Benefit Fixed Rate Account allocations.
- o  $I$  – the Income Value prior to the first withdrawal. The Income Value is equal to what the Annual Income Amount would be if the first withdrawal were taken on the date of calculation. After the first withdrawal the Income Value equals the greater of the Annual Income Amount, the quarterly step-up amount times the Annual Income Percentage, and the Account Value times the Annual Income Percentage.
- o  $T$  – the amount of a transfer into or out of the Benefit Fixed Rate Account.
- o  $I\%$  – Annual Income Amount percentage. This factor is established on the Effective Date and is not changed for the life of the guarantee.

**[TRUEINCOME - HIGHEST DAILY BENEFIT] SCHEDULE SUPPLEMENT (CONTINUED)**

**Target Value Calculation:**

On each Valuation Day, a target value (L) is calculated, according to the following formula.

$$L = I * Q * a$$

**Transfer Calculation:**

The following formula, which is set on the Effective Date of the 90% Cap Rule as shown in this Schedule Supplement and is not changed for the life of the guarantee, determines when a transfer is required. On the Effective Date of the 90% Cap Rule (and only on this date), the following asset transfer calculation is performed to determine the amount of Account Value allocated to the Benefit Fixed Rate Account:

$$\text{If } (F/(V + F) > .90) \text{ then} \\ T = F - [(V + F) * .90]$$

If T is greater than \$0 as described above, then no additional transfer calculations are performed on the Effective Date of the 90% Cap Rule. Any transfers to the Benefit Fixed Rate Account are suspended. The suspension will be lifted once a transfer out of the Benefit Fixed Rate Account occurs.

On each Valuation Day thereafter (including the Effective Date of the 90% Cap Rule, provided  $F/(V+F) \leq .90$ ), the following asset transfer calculation is performed

$$\text{Target Ratio } r = (L - F)/V$$

. If  $r > C_u$ , assets in the elected Sub-accounts are transferred to the Benefit Fixed Rate Account, provided transfers are not suspended under the 90% Cap Rule described below.

. If  $r < C_l$  and there are currently assets in the Benefit Fixed Rate Account ( $F > 0$ ), assets in the Benefit Fixed Rate Account are transferred to the elected Sub-accounts.

The following formula, which is set on the Effective Date of the 90% Cap Rule and is not changed for the life of the guarantee, determines the transfer amount:

$$T = \text{Min} (\text{MAX} (0, (0.90 * (V+F)) - F), [L - F - V * C_l] / (1 - C_l)) \quad \text{Money is transferred from the elected Sub-accounts to Benefit Fixed Rate Account}$$

$$T = \{\text{Min} (F, -[L - F - V * C_l] / (1 - C_l))\} \quad \text{Money is transferred from the Benefit Fixed Rate Account to the elected Sub-accounts.}$$

**[90%] Cap Rule:** If, on any Valuation Day, on and after the Effective Date of the 90% Cap Rule, a transfer into the Benefit Fixed Rate Account occurs which results in 90% of the Account Value being allocated to the Benefit Fixed Rate Account, any transfers into the Benefit Fixed Rate Account will be suspended, even if the formula would otherwise dictate that a transfer into the Benefit Fixed Rate Account should occur. Transfers out of the Benefit Fixed Rate Account and into the elected Sub-accounts will still be allowed. The suspension will be lifted once a transfer out of the Benefit Fixed Rate Account occurs. Due to the performance of the Benefit Fixed Rate Account and the elected Sub-Accounts, the Account Value could be more than 90% invested in the Benefit Fixed Rate Account.]

SERFF Tracking Number: PRUD-126116205 State: Arkansas  
 Filing Company: Allstate Life Insurance Company State Tracking Number: 42225  
 Company Tracking Number: 90% ALLSTATE  
 TOI: A02.II Individual Annuities- Deferred Non- Sub-TOI: A02.II.002 Flexible Premium  
 Variable and Variable  
 Product Name: 90% Allstate  
 Project Name/Number: 90% Allstate/90% Allstate

## Supporting Document Schedules

**Item Status:** **Status Date:**

**Bypassed - Item:** Flesch Certification  
**Bypass Reason:** Allstate believes that federal law exempts these forms from any "Flesch score" or readability requirements in your statutes or regulations.

**Comments:**

**Item Status:** **Status Date:**

**Bypassed - Item:** Application  
**Bypass Reason:** NOT APPLICABLE TO THIS FILING

**Comments:**

**Item Status:** **Status Date:**

**Satisfied - Item:** Cover Letter

**Comments:**

**Attachment:**

Allstate 90% Cap cover letter.pdf

**Item Status:** **Status Date:**

**Satisfied - Item:** Third Party Authorization

**Comments:**

**Attachment:**

ALIC Pru Letter of authorization.pdf

**Item Status:** **Status Date:**

**Satisfied - Item:** Memo of Variability A-SCH-HDLT(4/09)

SERFF Tracking Number: PRUD-126116205 State: Arkansas  
Filing Company: Allstate Life Insurance Company State Tracking Number: 42225  
Company Tracking Number: 90% ALLSTATE  
TOI: A02.II Individual Annuities- Deferred Non- Sub-TOI: A02.II.002 Flexible Premium  
Variable and Variable  
Product Name: 90% Allstate  
Project Name/Number: 90% Allstate/90% Allstate

**Comments:**

**Attachment:**

A-SCH-HDLT\_4-09\_ Memo of Variability.pdf

**Item Status:**

**Status  
Date:**

**Satisfied - Item:** Memo of Variability A-SCH-  
HD7(4/09)

**Comments:**

**Attachment:**

A-HD7 VarMem \_generic\_.pdf

**Item Status:**

**Status  
Date:**

**Satisfied - Item:** AR Fee Form

**Comments:**

**Attachment:**

AR - FEE FORM ALLSTATE.pdf

**Item Status:**

**Status  
Date:**

**Satisfied - Item:** AR Cert of Compliance

**Comments:**

**Attachment:**

AR CERT OF COMPLIANCE ALLSTATE.pdf



Pruco Life Insurance Company  
One Corporate Drive  
Shelton, CT 06484  
(203) 925-7197

**VIA SERFF**

April 27, 2009

Honorable Julia Benafield Bowman  
Insurance Commissioner  
Life and Health Division  
Arkansas Insurance Department  
1200 West Third Street  
Little Rock, AR 72201

Attn: Claudia Meeks, Rates and Form Filings

RE: Allstate Life Insurance Company ("Allstate," "we," "us")  
NAIC #79227 FEIN # 22-1944557

Forms Submitted for Approval:

Schedule Supplement Form A-SCH-HD7(4/09) For use with Rider Form A-RID-HD7(4/08) Approved on February 25, 2008

Schedule Supplement Form A-SCH-HDLT(4/09) For use with Rider Form A-RID-HDLT(7/07) Approved on September 5, 2007, File No. PRUD-125265035 and A-RID-HDLT(3/07) Approved on March 14, 2007

Dear Ms. Meeks:

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

The purpose of this form is to permit annuity owners that have an existing guaranteed living benefit rider to elect the terms contained in the referenced schedule pages without canceling the guarantees provided by the existing benefit. The main difference in the referenced schedule pages and the prior approved schedule pages is the Benefit Transfer Formula (a transfer formula used to monitor investment performance and move funds between the investment options selected by the annuity holder and a transfer account to mitigate the risks borne by the company associated with the optional rider's guarantees) is adjusted to place a 90% cap on transfers of the account value to the Benefit Transfer Account. Another difference is an "Effective Date of the 90% Cap Rule" item has been added to indicate the effective date.

The annuity forms submitted are designed for use for qualified and non-qualified sales, as defined in the Internal Revenue Code. Should this Rider be used with certain qualified sales described under the Internal Revenue Code, the appropriate endorsement approved or accepted by your Department, will be provided to the annuity holder and will be made part of the annuity to satisfy any federal qualified usage requirements.

Any brackets in the Schedule Supplements 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 actuarial memorandums, and any related material, are enclosed with this submission. These actuarial memorandums are annuity product-specific. Any certifications or other materials Allstate believes you require are also enclosed. Allstate believes that federal law exempts these forms from any "Flesch score" or readability requirements in your statutes or regulations. Unless otherwise informed, Allstate reserves the right to alter the pagination, layout, including sequential order, color, and typeface of these forms. Allstate 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  
Phone: (203) 944-7544  
Email: Pamela.Bonaparte-Golding@prudential.com  
Fax: (203) 944-7737

Enclosures



DATE: April 16, 2009  
TO: The Insurance Commissioner  
RE: **Allstate Life Insurance Company**  
**NAIC# 08-60186**

**Authorization to File Rider Forms**

**Forms: A-SCH-HD7(4/09) And A-SCH-HDLT(4/09)**  
**(And any State Variations Thereto)**

This letter will serve as notification to your Department that Pruco Life Insurance Company, and its employees, is authorized to submit the above captioned variable annuity Riders and their respective Schedule Supplements, and any associated annuity forms for such Riders and Schedule Supplements on behalf of Allstate Life Insurance Company.

If you have any questions concerning the above, please do not hesitate to contact me at 847.402.8672.

\_\_\_\_\_  
Signature

Timothy Vander Pas  
Name

Assistant Vice President  
Title

April 16, 2009  
Date

**ALLSTATE LIFE INSURANCE COMPANY**

**MEMORANDUM OF VARIABILITY FOR  
TRUEINCOME HIGHEST DAILY BENEFIT  
SCHEDULE SUPPLEMENT A-SCH-HDLT(4/09)**

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

**VARIATIONS BY PURCHASER:**

<b>1. Annuity Number</b>	This is the number assigned to the Annuity by us for record keeping purposes.
<b>2. Effective Date of Rider</b>	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.
<b>3. Effective Date of the 90% Cap Rule</b>	This date will illustrate the date that the 90% Cap Rule was elected by the applicant. It may be the Effective Date, if this benefit is elected at the time the Rider is purchased, or a subsequent date, if this benefit is elected post-issue.

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

<b>4. [Spousal] Designated Life/Lives</b>	This item will reflect the name and birth date of the individual(s) for whom we issue this benefit as the Designated Life.
<b>5. Roll-Up Rate</b>	Currently the Roll-Up Rate is 5% per year. In the future we may use a Roll-Up Rate ranging between 0% and 10% per year. Roll-Up Rates may vary, based on the period the benefit has been in effect under the Annuity, e.g., 5% for the first three years the benefit is in effect, 4% for the remainder of the period, etc.
<b>6. Annual Income Percentage</b>	At launch this item will be 5%. In the future this item may be based on the age of the single Designated Life or the younger Spousal Designated Life at the time of the first withdrawal. This item might also be based on whether the benefit is effective on the Issue Date or is elected post-issue. We may also vary the percentage based on the duration from the Effective Date of the Rider to the date of the first withdrawal. The range for the Annual Income Percentage is 1% to 10%.
<b>7. Minimum Guarantee Payment</b>	Currently this amount is \$100. In the future this amount may be as little as \$25 or as much as \$1000.
<b>8. Charge for the Rider</b>	Currently the charge for this benefit is assessed daily at the equivalent of an annual rate of 0.60% of the daily Account Value attributed to, and maintained for, each sub-account if the benefit is elected with a single Designated Life; 0.75% if the benefit is elected with Spousal Designated Lives. In the future we may vary the charge, using a range of 0% to 1.50%. Within these charge limits, we may set the charge based on the age of the Purchaser on the Issue Date or the Effective Date of the Rider, the attained age of the Annuitant, or the period of time the Rider has been in effect.

<p><b>9. Interest Rate Minimum</b></p>	<p>The Interest Rate Minimum applicable to the Benefit Fixed Interest Rate Account under the TrueIncome Highest Daily Benefit Rider will be determined from the nonforfeiture rate. The nonforfeiture rate will be updated twice a calendar year, on every January 1 and July 1. The nonforfeiture rate will be based on a 5-year Constant Maturity Treasury Rate index, rounded to the nearest 1/20<sup>th</sup> of one percent, reduced by 1.25%, where the resulting nonforfeiture rate is not less than 1%, nor greater than 3%.</p> <p>The index used to determine the January 1 nonforfeiture rate will be based on the average 5-year Constant Maturity Treasury Rate reported by the Federal Reserve for the preceding month of November, and the index used to determine the July 1 nonforfeiture rate will be based on the average 5-year Constant Maturity Treasury Rate reported by the Federal Reserve for the preceding month of May.</p> <p>The nonforfeiture rate will not be redetermined during the time the TrueIncome Highest Daily Benefit Rider is in force under the Annuity; the nonforfeiture rate applicable on the Effective Date of the Rider will apply for the period the Rider is in effect.</p> <p>If we change our methodology for setting the indexed Interest Rate Minimum for the Benefit Fixed Interest Rate Account, we will first file the new methodology with the appropriate regulatory agency for review (together with any necessary actuarial and contractual materials) before implementing the new methodology.</p> <p>The Interest Rate Minimum under the Rider will mirror the minimum interest rate structure applicable to the fixed interest rate allocation option available under the base annuity. That is:</p> <ul style="list-style-type: none"> <li>• the Interest Rate Minimum percentage(s) will be identical to the guaranteed minimum interest rate(s) set forth in the base annuity for the available fixed interest rate allocation option, and</li> <li>• stated changes in any applicable tiered Interest Rate Minimum under this Rider will take effect with respect to Crediting Periods starting on or after a specific anniversary of the Issue Date/Contract Date of the Annuity, as stated in the Schedule Supplement.</li> </ul>
<p><b>10. Annuity Payment Table</b></p>	<p>This table may vary, depending on the mortality table, interest rate, and any age set back or projected mortality improvement scale used, as well as the age intervals illustrated.</p>
<p><b>11. Transfer Formula</b></p>	<p>We reserve the right to replace this entire section with another program that is based on a static calculation formula. Such replacement will not affect existing business and will only apply to new elections of this Rider.</p>
<p><b>12. 90% Cap Rule:</b></p>	<p>Currently transfers to the Transfer Account will be suspended when 90% of the Account Value is allocated to the Transfer Account. In the future, the cap may range from 50% to 100%.</p>

**Please refer to illustration on following pages**

**ALLSTATE LIFE INSURANCE COMPANY  
3100 SANDERS ROAD  
NORTHBROOK, IL 60062**

**TRUEINCOME - HIGHEST DAILY BENEFIT  
SCHEDULE SUPPLEMENT**

**Annuity Number:** <sup>1</sup> [XXXXXXX]

**Effective Date of the Rider:** <sup>2</sup> [Issue Date of the Annuity]

**Effective Date of [90%] Cap Rule:** <sup>3</sup> [Issue Date of Schedule Supplement]

<sup>4</sup> [[Spousal] Designated Live/Lives]:

[John Doe]      **Date of Birth:** [February 21, 1955]  
[[Mary Doe]    **Date of Birth:** [January 1, 1956]]

**Roll-Up Rate:** <sup>5</sup> [5.0% per year]

**Annual Income Percentage:** <sup>6</sup> [[5.0%]

[The Annual Income Amount is determined at the time of the first withdrawal after the Effective Date and on a Designated Life's age at the time of the first withdrawal. It is equal to an Annual Income Percentage, as shown below, applied against the Protected Withdrawal Value. For Spousal Designated Lives, the percentage is based on the youngest Designated Life's age at the time of the first withdrawal.]

Age of Designated Life	Annual Income Percentage Applied Against Protected Withdrawal Value
50 – 64	4%
65 – 74	5%
75 – 84	6%
85+	7%

]]

**Minimum Guaranteed Payment:** <sup>7</sup> [\$100]

**Charge for the Rider:** <sup>8</sup> [The daily equivalent of an annual rate applied to Sub-accounts:  
[For Single Designated Life: [0.60]%)  
[For Spousal Designated Lives: [0.75]%)

**Interest Rate Minimum:** <sup>9</sup> [[2.0% annually for crediting periods that start prior to the [tenth] anniversary of the Annuity's Issue Date; [3.0% annually for crediting periods that start on or after the [tenth] anniversary of the Annuity's Issue Date].

**TRUEINCOME - HIGHEST DAILY SCHEDULE SUPPLEMENT (CONTINUED)**

**Annuity Payment Table:** <sup>10</sup> [The Annuity Payment Table below is used to compute the minimum annual amount of a single life annuity payment with 10 payments certain per \$1,000 applied. We used the Annuity 2000 Valuation Mortality Table, less two years, with projected mortality improvements (modified scale G), with an interest rate of [3]% per year in preparing the Annuity Payment Table.

**Single Life Annuity Payment with 10 Payments Certain**

AGE	MALE	FEMALE	UNISEX	AGE	MALE	FEMALE	UNISEX
55	49.00	45.76	46.42	80	98.01	89.91	91.52
60	54.01	50.01	50.82	85	117.86	110.78	112.20
65	60.77	55.70	56.72	90	140.50	135.96	136.88
70	69.95	63.49	64.78	95	163.30	160.31	160.93
75	82.13	74.48	76.00				

The Annuity Payment Table below is used to compute the minimum annual amount of a joint and last survivor life annuity payment with 10 payments certain per \$1,000 applied. We used Annuity 2000 Valuation Mortality Table, less two years, with projected mortality improvements (modified scale G), and an interest rate of [3]% per year in preparing the Annuity Payment Table.

**Joint and Last Survivor Life Annuity Payment with 10 Payments Certain**

**Female Age**

	55	60	65	70	75	80	85	90	95
55	42.00	43.62	45.09	46.32	47.26	47.92	48.33	48.54	48.63
60	43.07	45.24	47.37	49.31	50.90	52.06	52.79	53.18	53.36
65	43.93	46.65	49.56	52.43	55.01	57.03	58.39	59.14	59.48
70	44.57	47.77	51.45	55.41	59.32	62.69	65.11	66.52	67.20
75	45.00	48.58	52.91	57.94	63.37	68.52	72.56	75.07	76.33
80	45.29	49.11	53.92	59.84	66.72	73.86	79.99	84.06	86.23
85	45.45	49.42	54.54	61.07	69.10	78.04	86.32	92.22	95.52
90	45.54	49.59	54.88	61.76	70.52	80.75	90.76	98.26	102.64
95	45.58	49.67	55.04	62.10	71.25	82.23	93.36	101.97	107.14

**TRUEINCOME - HIGHEST DAILY BENEFIT SCHEDULE SUPPLEMENT (CONTINUED)**

The factors in the Annuity Payment Tables are based on the Annuitant's(s') Adjusted Age and Sex. The Adjusted Age is the age last birthday prior to the date on which the first Annuity Payment is due, adjusted as shown in the "Translation of Adjusted Age Table" below.

**Translation of Adjusted Age Table**

Calendar Year in Which First Payment is Due	Adjusted Age	Calendar Year in Which First Payment is Due	Adjusted Age
Prior to 2010	Actual Age	2050 through 2059	Actual Age minus 5
2010 though 2019	Actual Age minus 1	2060 through 2069	Actual Age minus 6
2020 through 2029	Actual Age minus 2	2070 through 2079	Actual Age minus 7
2030 through 2039	Actual Age minus 3	2080 through 2089	Actual Age minus 8
2040 through 2049	Actual Age minus 4	2090 through 2099	Actual Age minus 9]

[The program described in the Rider monitors your Account Value daily, and, as determined by the formula set forth below, transfers are made between the Sub-accounts and the Benefit Fixed Rate Account. At any given time, some, most, or none of the Account Value may be allocated to the Benefit Fixed Rate Account under the formula.

Any transfers out of the Sub-accounts into the Benefit Fixed Rate Account are made on a pro rata basis. Any transfers out of the Benefit Fixed Rate Account are taken out of the Benefit Fixed Rate Account on a last-in, first-out basis. Such transfer amounts are deposited into the Sub-accounts on a pro rata basis, unless you instruct us otherwise.

**<sup>11</sup> Terms and Definitions referenced in the calculation formula:**

- o  $C_u$  – the upper target is established on the Effective Date and is not changed for the life of the guarantee.
- o  $C_t$  – the target is established on the Effective Date and is not changed for the life of the guarantee.
- o  $C_l$  – the lower target is established on the Effective Date and is not changed for the life of the guarantee.
- o  $L$  – the target value as of the current Valuation Day.
- o  $r$  – the target ratio.
- o  $a$  – the factors used in calculating the target value. These factors are established on the Effective Date and are not changed for the life of the guarantee.
- o  $Q$  – age based factors used in calculating the target value. These factors are established on the Effective Date and are not changed for the life of the guarantee.
- o  $V$  – the total value of all Sub-accounts in the Annuity.
- o  $F$  – the total value of all Benefit Fixed Rate Account allocations.
- o  $I$  – the Income Value prior to the first withdrawal. The Income Value is equal to what the Annual Income Amount would be if the first withdrawal were taken on the date of calculation. After the first withdrawal the Income Value equals the greater of the Annual Income Amount, the quarterly step-up amount times the Annual Income Percentage, and the Account Value times the Annual Income Percentage.
- o  $T$  – the amount of a transfer into or out of the Benefit Fixed Rate Account.
- o  $I\%$  – Annual Income Amount percentage. This factor is established on the Effective Date and is not changed for the life of the guarantee.

TRUEINCOME - HIGHEST DAILY BENEFIT SCHEDULE SUPPLEMENT (CONTINUED)

**Target Value Calculation:**

On each Valuation Day, a target value (L) is calculated, according to the following formula.

$$L = I * Q * a$$

**Transfer Calculation:**

The following formula, which is set on the Effective Date of the 90% Cap Rule as shown in this Schedule Supplement and is not changed for the life of the guarantee, determines when a transfer is required. On the Effective Date of the 90% Cap Rule (and only on this date), the following asset transfer calculation is performed to determine the amount of Account Value allocated to the Benefit Fixed Rate Account:

$$\text{If } (F/(V + F) > .90) \text{ then} \\ T = F - [(V + F) * .90]$$

If T is greater than \$0 as described above, then no additional transfer calculations are performed on the Effective Date of the 90% Cap Rule. Any transfers to the Benefit Fixed Rate Account are suspended. The suspension will be lifted once a transfer out of the Benefit Fixed Rate Account occurs.

On each Valuation Day thereafter (including the Effective Date of the 90% Cap Rule, provided  $F/(V+F) \leq .90$ ), the following asset transfer calculation is performed

$$\text{Target Ratio } r = (L - F)/V$$

. If  $r > C_u$ , assets in the elected Sub-accounts are transferred to the Benefit Fixed Rate Account, provided transfers are not suspended under the 90% Cap Rule described below.

. If  $r < C_l$  and there are currently assets in the Benefit Fixed Rate Account ( $F > 0$ ), assets in the Benefit Fixed Rate Account are transferred to the elected Sub-accounts.

The following formula, which is set on the Effective Date of the 90% Cap Rule and is not changed for the life of the guarantee, determines the transfer amount:

$T = \text{Min} (\text{MAX} (0, (0.90 * (V+F)) - F), [L - F - V * C_l] / (1 - C_l))$  Money is transferred from the elected Sub-accounts to Benefit Fixed Rate Account

$T = \{\text{Min} (F, -[L - F - V * C_l] / (1 - C_l))\}$  Money is transferred from the Benefit Fixed Rate Account to the elected Sub-accounts.

**<sup>12</sup> 90% Cap Rule:** If, on any Valuation Day, on and after the Effective Date of the 90% Cap Rule, a transfer into the Benefit Fixed Rate Account occurs which results in 90% of the Account Value being allocated to the Benefit Fixed Rate Account, any transfers into the Benefit Fixed Rate Account will be suspended, even if the formula would otherwise dictate that a transfer into the Benefit Fixed Rate Account should occur. Transfers out of the Benefit Fixed Rate Account and into the elected Sub-accounts will still be allowed. The suspension will be lifted once a transfer out of the Benefit Fixed Rate Account occurs. Due to the performance of the Benefit Fixed Rate Account and the elected Sub-Accounts, the Account Value could be more than 90% invested in the Benefit Fixed Rate Account.]

**ALLSTATE LIFE INSURANCE COMPANY**

**STATEMENT OF VARIABILITY FOR  
TRUEINCOME - HIGHEST DAILY 7 BENEFIT  
SCHEDULE SUPPLEMENT A-SCH-HD7(4/09)**

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

Currently, for marketing purposes, the benefit is referenced as the "TrueIncome - Highest Daily 7 Benefit." We may change the marketing name to accommodate future business needs or if we enter into a proprietary or private placement arrangement.

The current Company address is as indicated in the referenced annuity forms. This is subject to change over time.

From time to time we may use administrative codes/information for recordkeeping purposes. If we do, such information will appear on the bottom right hand side of the form, one line below the state filed annuity form number or in the upper right side of the form above the Company name. We consider any administrative information to not be part of the filed annuity form. We reserve the right to include, delete, or change administrative information.

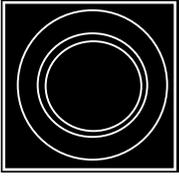
**VARIATIONS BY PURCHASER:**

<b>Annuity Number</b>	This is the number assigned to the Annuity by us for record keeping purposes.
<b>Effective Date</b>	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.
<b>Effective Date of the 90% Cap Rule</b>	This date will illustrate the date that the 90% Cap Rule was elected by the applicant. It may be the Effective Date, if this benefit is elected at the time the Rider is purchased, or a subsequent date, if this benefit is elected post-issue.
<b>[[Spousal] Designated Life/Lives]</b>	This item will reflect the name and birth date of the individual(s) for whom we issue this benefit as the Designated Life/Lives.

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

<b>Roll-Up Rate</b>	Currently the Roll-Up Rate is 7% per year. In the future we may use a Roll-Up Rate ranging between 0% and 10% per year. Roll-Up Rates may vary, based on the period the benefit has been in effect under the Annuity, e.g., 5% for the first three years the benefit is in effect, 4% for the remainder of the period, etc.
<b>Annual Income Percentage</b>	Currently this percentage is based on attained age of the single Designated Life or the younger of the Spousal Designated Lives. Currently, the range for this item is 5% to 8%. In the future, the Annual Income Percentage may range from 1% to 10%.

<b>Minimum Guarantee Payment</b>	Currently this amount is \$100. In the future this amount may be as little as \$25 or as much as \$1000.
<b>Transfer Account</b>	This is the name of the account to which and from which we may transfer funds, as determined by the Transfer Calculation Formula. Currently the Transfer Account is the AST Investment Grade Bond Portfolio. If this portfolio is discontinued, we will substitute a successor portfolio, if there is one. Otherwise, we will substitute a comparable portfolio. We will obtain any required regulatory approvals prior to substitution of the portfolio.
<b>Charge for the Rider</b>	<p>Currently the charge for this benefit is assessed at the end of each Benefit Quarter at the quarterly equivalent of an annual rate of 0.60% if the benefit is elected with a Single Designated Life. If this benefit is elected with Spousal Designated Lives, the charge is the quarterly equivalent of an annual rate of 0.75%, and the insert for the "Charge for the Rider" would read: "You have elected this Rider on a Spousal Designated Lives basis. Therefore, the annual rate is 0.75%."</p> <p>In the future we may vary the charge, using a range of 0% to 1.50% when this benefit is elected on either a Single Designated Life or Spousal Designated Lives basis.</p>
<b>Annuity Payment Table</b>	This table may vary, depending on the mortality table, interest rate, and any age set back or projected mortality improvement scale used, as well as the age intervals illustrated.
<b>Transfer Calculation Formula</b>	We reserve the right to replace this entire section with another program that is based on a static calculation formula. Such replacement will not affect existing business and will only apply to new elections of this Rider.
<b>90% Cap Rule:</b>	Currently transfers to the Transfer Account will be suspended when 90% of the Account Value is allocated to the Transfer Account. In the future, the cap may range from 50% to 100%.



**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: Allstate Life Insurance Company

Company NAIC Code: 60186

Company Contact Person & Telephone # Pamela Bonaparte-Golding 800-628-6039 x47544

INSURANCE DEPARTMENT USE ONLY

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 \$ 25 = \$50\_\_

\*\*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.

**Allstate Life Insurance Company  
3100 Sanders Road  
Northbrook, IL 60062**

**STATE OF ARKANSAS  
CERTIFICATION OF COMPLIANCE**

I hereby certify that Allstate Life Insurance Company complies with the requirements of Rules and Regulation #34 of the Arkansas Insurance Department regarding Form Numbers: A-SCH-HD7(4/09), A-SCH-HDLT(4/09)



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Timothy Vander Pas  
Assistant Vice President

April 20, 2009  
Date