

SERFF Tracking Number: NALF-126068305 State: Arkansas
 Filing Company: Life Insurance Company of the Southwest State Tracking Number: 42509
 Company Tracking Number: 8744(0709)
 TOI: L09I Individual Life - Flexible Premium Sub-TOI: L09I.101 External Indexed - Single Life
 Adjustable Life
 Product Name: Enhanced Policy Protection Period Rider
 Project Name/Number: Enhanced Policy Protection Period Rider/8744(0709)

Filing at a Glance

Company: Life Insurance Company of the Southwest

Product Name: Enhanced Policy Protection Period Rider SERFF Tr Num: NALF-126068305 State: Arkansas

TOI: L09I Individual Life - Flexible Premium SERFF Status: Closed-Approved- State Tr Num: 42509
 Adjustable Life Closed

Sub-TOI: L09I.101 External Indexed - Single Life Co Tr Num: 8744(0709) State Status: Approved-Closed

Filing Type: Form

Reviewer(s): Linda Bird

Authors: Susan Carey, Laurie Trombly, Michelle Goodwin, Susan
 Freedom

Disposition Date: 06/02/2009

Date Submitted: 05/29/2009

Disposition Status: Approved-Closed

Implementation Date Requested: On Approval

Implementation Date:

State Filing Description:

General Information

Project Name: Enhanced Policy Protection Period Rider

Status of Filing in Domicile: Pending

Project Number: 8744(0709)

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: 06/02/2009

Explanation for Other Group Market Type:

State Status Changed: 06/02/2009

Deemer Date:

Created By: Michelle Goodwin

Submitted By: Michelle Goodwin

Corresponding Filing Tracking Number:

Filing Description:

Today we submit for you consideration a new rider to our Flexible Premium Adjustable Benefit Life Insurance policies.

Company and Contact

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Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved-Closed	Linda Bird	06/02/2009	06/02/2009

SERFF Tracking Number: NALF-126068305 *State:* Arkansas
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Disposition

Disposition Date: 06/02/2009

Implementation Date:

Status: Approved-Closed

Comment:

Rate data does NOT apply to filing.

SERFF Tracking Number: NALF-126068305 State: Arkansas
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Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Flesch Certification	Yes	Yes
Supporting Document	Application	No	No
Supporting Document	Health - Actuarial Justification	No	No
Supporting Document	Outline of Coverage	No	No
Supporting Document	Cover Letter	Yes	Yes
Supporting Document	Actuarial memorandums	No	No
Supporting Document	Actuary Illustration	No	No
Supporting Document	Responsible Officer Cert	Yes	Yes
Supporting Document	Third Party Authorization	Yes	Yes
Supporting Document	Statement of Variability	Yes	Yes
Form	Enhanced Policy Protection Period Rider	Yes	Yes
Form	Data Page for PRVR	Yes	Yes
Form	Data Page for PRGN	Yes	Yes
Form	Data Page for PRGN/U	Yes	Yes
Form	Data Page for PRVR/U	Yes	Yes

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Form Schedule

Lead Form Number: 8744(0709)

Schedule Item Status	Form Number	Form Type	Form Name	Action	Action Specific Data	Readability	Attachment
	8744(0709)	Policy/Cont	Enhanced Policy Protection Period Rider	Initial		80.500	8744.pdf
			Certificate: Amendmen t, Insert Page, Endorseme nt or Rider				Rider DataPage.87 44 On8212.pdf
			Data/DeclarData Page for PRVR Initial ation Pages				Rider DataPage.87 44 On8387.pdf
			Data/DeclarData Page for ation PagesPRGN/U	Initial			Rider DataPage.87 44 On8733.pdf
			Data/DeclarData Page for ation PagesPRVR/U	Initial			Rider DataPage.87 44 On8734.pdf

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Impact of Withdrawals and Policy Loans	1
Suspension of Monthly Deductions	2
Suicide Limitation	2
Incontestability	2
Consideration	2
Notice of Pending Termination of this Rider	2
Termination of this Rider	3

ENHANCED POLICY PROTECTION PERIOD RIDER

We, Life Insurance Company of the Southwest, guarantee that the policy will remain in force as long as the Conditions of this Rider are met. This guarantee ensures that a Death Benefit, and the Additional Protection Benefit of any Rider for Additional Protection Benefit attached to the policy, will be payable under the policy for as long as this rider remains in force.

The date of issue of this rider is the policy Date of Issue.

MONTHLY GUARANTEE PREMIUM

The Monthly Guarantee Premium specific to this rider is stated in the Data Section. It is subject to change upon increases or decreases in Face Amount, and additions or deletions of rider coverages.

CONDITIONS OF THIS RIDER

The Enhanced Policy Protection Period is shown in the Data Section. During the Enhanced Policy Protection Period, to keep this rider in force, the accumulation of premiums paid, net of any withdrawals and debt must, on each Monthly Policy Date equal at least the accumulated Monthly Guarantee Premiums in effect on each Monthly Policy Date since the Date of Issue. Compliance with this condition will be determined on every Monthly Policy Date.

Premiums paid and withdrawals made will be accumulated with interest from the date of each premium payment or withdrawal (or from the Monthly Policy Date immediately preceding such date if the premium payment or withdrawal is not made on a Monthly Policy Date) to the Monthly Policy Date on which the evaluation is being made. The Monthly Guarantee Premiums in effect on each prior Monthly Policy Date will similarly be accumulated with interest to the same Monthly Policy Date. The interest rate used in these accumulations will be the Enhanced Policy Protection Period Interest Rate shown in the Data Section.

IMPACT OF WITHDRAWALS AND POLICY LOANS

Withdrawals and policy loans taken against the policy will impact the calculation described in the Conditions of this Rider. If a withdrawal made or a policy loan taken against the policy leaves the policy out of compliance with the Conditions of this Rider, a Notice of Pending Termination of this Rider will be sent to the Owner.

Life Insurance Company of the Southwest
*Administrative Office: One National Life Drive * Montpelier, Vermont 05604 * (800) 732-8939*
*Home Office: 1300 West Mockingbird Lane * Dallas, Texas 75247*

SUSPENSION OF
MONTHLY
DEDUCTIONS

If, while this rider is in force, the Cash Surrender Value of the policy is not sufficient to cover the Monthly Deductions, Monthly Deductions will be deducted from the Accumulated Value until the Accumulated Value is exhausted, and will thereafter be deferred until such time as the policy has positive Accumulated Value. Monthly Deductions in arrears will not be accumulated with interest.

Upon the death of the Insured, we will waive any Monthly Deductions then in arrears. Otherwise, Monthly Deductions in arrears will be due upon termination of this rider.

SUICIDE
LIMITATION

If the Insured dies within two years of the date of issue of this rider as the result of suicide, while sane or insane, we will pay only the sum set forth in the Suicide Limitation provision of the policy. Payment will be made to the Beneficiary.

INCONTESTABILITY

After this rider has been in force during the life of the Insured for two years from its date of issue, we will not contest it.

CONSIDERATION

There is no separate premium charge for this benefit.

NOTICE OF
PENDING
TERMINATION OF
THIS RIDER

If on any Monthly Policy Date the Conditions of this Rider are not met, the Owner will be sent notice that unless the premium described below is paid during the first 61 days measured from the date we mailed such notice, this rider will terminate. The required premium will be the minimum premium accumulated with interest sufficient to satisfy the Conditions of this Rider on the Monthly Policy Date three months following the Monthly Policy Date on which the failure to meet the Conditions of this Rider prompted the mailing of this notice.

Life Insurance Company of the Southwest

*Administrative Office: One National Life Drive * Montpelier, Vermont 05604 * (800) 732-8939*

*Home Office: 1300 West Mockingbird Lane * Dallas, Texas 75247*

TERMINATION OF
THIS RIDER

This rider will terminate on the earliest of:

1. the end of the 61st day following our mailing of a Notice of Pending Termination of this Rider, if prior to that time the premium described in Notice of Pending Termination of this Rider is not paid; or
2. the date the Death Benefit Option of the policy is changed to Option B; or
3. the date the policy terminates. If the policy is reinstated, this rider will not be reinstated; or
4. any Monthly Policy Date requested, if before that date we receive at our Administrative Office written request for termination of this rider.
5. the end of the Enhanced Policy Protection Period as stated in this rider's Data Section.

When this rider terminates:

1. all rights under this rider will cease; and
2. it cannot be reinstated; and
3. the policy will be considered separate and complete without this rider.

If this rider terminates while the Cash Surrender Value of the policy is zero, the policy may enter a Grace Period and an additional payment, as determined by the Grace Period provision of the policy, may be required to keep the policy in force.

Signed for Life Insurance Company of the Southwest at Dallas, Texas, as of the date of issue of this rider, by



Secretary

Life Insurance Company of the Southwest
*Administrative Office: One National Life Drive * Montpelier, Vermont 05604 * (800) 732-8939*
*Home Office: 1300 West Mockingbird Lane * Dallas, Texas 75247*

DATA SECTION

POLICY NUMBER: [LS1234567]

EFFECTIVE DATE: [JULY 15, 2009]

MATURITY DATE: [JULY 15, 2094]

INSURED: [ETHAN ALLEN]

ISSUE AGE: [35]

FACE AMOUNT: [\$100,000]

OWNER: [AS STATED IN THE APPLICATION UNLESS LATER CHANGED]

BENEFICIARY: [AS STATED IN THE APPLICATION UNLESS LATER CHANGED]

MONTHLY POLICY DATE: [15TH]

DEATH BENEFIT OPTION: [A]

MINIMUM MONTHLY PREMIUM: \$[46.02]

MONTHLY GUARANTEED PREMIUM: \$[46.02]

PLANNED PERIODIC PREMIUM: \$[540.08] PAYABLE [Annually]

FOR PREMIUM PAYMENT PERIOD: [JULY 01, 2009 TO JULY 01, 2094]

THIS POLICY MAY TERMINATE PRIOR TO THE END OF THE PREMIUM PAYMENT PERIOD IF PREMIUMS PAID ARE INSUFFICIENT TO CONTINUE COVERAGE. PREMIUMS IN ADDITION TO THE PLANNED PERIODIC PREMIUM MAY BE NECESSARY TO KEEP THIS COVERAGE IN FORCE.

POLICY LOANS AND WITHDRAWALS WILL REDUCE THE CASH SURRENDER VALUE OF THIS POLICY AND MAY RESULT IN TERMINATION OF THIS POLICY PRIOR TO THE DEATH OF THE INSURED.

MINIMUM FACE AMOUNT: \$25,000.00

WITHDRAWAL FEE: \$25 FOR EACH WITHDRAWAL

ADDITIONAL BENEFIT RIDERS:

ENHANCED POLICY PROTECTION PERIOD RIDER

THE LOAN INTEREST RATE IS VARIABLE. THE LOAN INTEREST RATE AT THE EFFECTIVE DATE IS [6.60%].

PRVR [LS1234567]

DATA SECTION

COVER PAGE

DATA SECTION

ENHANCED POLICY PROTECTION PERIOD RIDER

COVERAGE AMOUNT: \$[100,000]
POLICY NUMBER: [LS1234567]
INSURED: [ETHAN ALLEN]
EFFECTIVE DATE: [JULY 15, 2009]

ENHANCED POLICY PROTECTION PERIOD INTEREST RATE: 5.00%

THE ENHANCED POLICY PROTECTION PERIOD IS IN EFFECT THROUGH [JULY 14, 2029]

DATA SECTION

DATA SECTION

ENHANCED POLICY PROTECTION PERIOD RIDER

COVERAGE AMOUNT: \$[100,000]
POLICY NUMBER: [LS1234567]
INSURED: [ETHAN ALLEN]
EFFECTIVE DATE: [JULY 15, 2009]

ENHANCED POLICY PROTECTION PERIOD INTEREST RATE: 5.00%

THE ENHANCED POLICY PROTECTION PERIOD IS IN EFFECT THROUGH [JULY 14, 2029]

DATA SECTION

(who code/agency #)

DATA SECTION

POLICY NUMBER: [LS1234567] EFFECTIVE DATE: [JULY 15, 2009]
Maturity Date: [JULY 15, 2094]

INSURED: [ETHAN ALLEN]

ISSUE AGE: [35] FACE AMOUNT: [\$100,000]

OWNER: [AS STATED IN THE APPLICATION UNLESS LATER CHANGED]
BENEFICIARY: [AS STATED IN THE APPLICATION UNLESS LATER CHANGED]

MONTHLY POLICY DATE: [15TH]

DEATH BENEFIT OPTION: [A]

MINIMUM MONTHLY PREMIUM: \$ [45.36]
MONTHLY GUARANTEED PREMIUM: \$ [45.36]
PLANNED PERIODIC PREMIUM: \$ [532.34] PAYABLE [Annually]
FOR PREMIUM PAYMENT PERIOD: [JULY 15, 2009 TO JULY 15, 2094]

THIS POLICY MAY TERMINATE PRIOR TO THE END OF THE PREMIUM PAYMENT PERIOD IF PREMIUMS PAID ARE INSUFFICIENT TO CONTINUE COVERAGE. PREMIUMS IN ADDITION TO THE PLANNED PERIODIC PREMIUM MAY BE NECESSARY TO KEEP THIS COVERAGE IN FORCE.

POLICY LOANS AND WITHDRAWALS WILL REDUCE THE CASH SURRENDER VALUE OF THIS POLICY AND MAY RESULT IN TERMINATION OF THIS POLICY PRIOR TO THE DEATH OF THE INSURED.

MINIMUM COVERAGE AMOUNT: \$100,000
WITHDRAWAL FEE: \$25 FOR EACH WITHDRAWAL

ADDITIONAL BENEFIT RIDERS:
ENHANCED POLICY PROTECTION PERIOD RIDER

THE LOAN INTEREST RATE IS VARIABLE. THE LOAN INTEREST RATE AT THE EFFECTIVE DATE IS [6.60%].

PRGN/U [LS1234567]

DATA SECTION
COVER PAGE

DATA SECTION

ENHANCED POLICY PROTECTION PERIOD RIDER

COVERAGE AMOUNT: \$[100,000]
POLICY NUMBER: [LS1234567]
INSURED: [ETHAN ALLEN]
EFFECTIVE DATE: [JULY 15, 2009]

ENHANCED POLICY PROTECTION PERIOD INTEREST RATE: 5.00%

THE ENHANCED POLICY PROTECTION PERIOD IS IN EFFECT THROUGH [JULY 14, 2029]

DATA SECTION

ENHANCED POLICY PROTECTION PERIOD RIDER - PAGE 1 OF 1

DATA SECTION

POLICY NUMBER: [LS1234567]

EFFECTIVE DATE: [JULY 15, 2009]

MATURITY DATE: [JULY 15, 2094]

INSURED: [ETHAN ALLEN]

ISSUE AGE: [35]

FACE AMOUNT: [\$100,000]

OWNER: [AS STATED IN THE APPLICATION UNLESS LATER CHANGED]

BENEFICIARY: [AS STATED IN THE APPLICATION UNLESS LATER CHANGED]

MONTHLY POLICY DATE: [15TH]

DEATH BENEFIT OPTION: [A]

MINIMUM MONTHLY PREMIUM: \$[44.78]

MONTHLY GUARANTEED PREMIUM: \$[44.78]

PLANNED PERIODIC PREMIUM: \$[525.53] PAYABLE [Annually]

FOR PREMIUM PAYMENT PERIOD: [JULY 15, 2009 TO JULY 15, 2094]

THIS POLICY MAY TERMINATE PRIOR TO THE END OF THE PREMIUM PAYMENT PERIOD IF PREMIUMS PAID ARE INSUFFICIENT TO CONTINUE COVERAGE. PREMIUMS IN ADDITION TO THE PLANNED PERIODIC PREMIUM MAY BE NECESSARY TO KEEP THIS COVERAGE IN FORCE.

POLICY LOANS AND WITHDRAWALS WILL REDUCE THE CASH SURRENDER VALUE OF THIS POLICY AND MAY RESULT IN TERMINATION OF THIS POLICY PRIOR TO THE DEATH OF THE INSURED.

MINIMUM FACE AMOUNT: \$25,000.00

WITHDRAWAL FEE: \$25 FOR EACH WITHDRAWAL

ADDITIONAL BENEFIT RIDERS:

ENHANCED POLICY PROTECTION PERIOD RIDER

THE LOAN INTEREST RATE IS VARIABLE. THE LOAN INTEREST RATE AT THE EFFECTIVE DATE IS [6.60%].

PRVR/U

[LS1234567]

DATA SECTION

COVER PAGE

DATA SECTION

ENHANCED POLICY PROTECTION PERIOD RIDER

COVERAGE AMOUNT: \$[100,000]
POLICY NUMBER: [LS1234567]
INSURED: [ETHAN ALLEN]
EFFECTIVE DATE: [JULY 15, 2009]

ENHANCED POLICY PROTECTION PERIOD INTEREST RATE: 5.00%

THE ENHANCED POLICY PROTECTION PERIOD IS IN EFFECT THROUGH [JULY 14, 2029]

DATA SECTION

SERFF Tracking Number: NALF-126068305 State: Arkansas
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 Company Tracking Number: 8744(0709)
 TOI: L09I Individual Life - Flexible Premium Sub-TOI: L09I.101 External Indexed - Single Life
 Adjustable Life
 Product Name: Enhanced Policy Protection Period Rider
 Project Name/Number: Enhanced Policy Protection Period Rider/8744(0709)

Supporting Document Schedules

	Item Status:	Status Date:
Satisfied - Item: Flesch Certification Comments: Attachment: Arkansas Readability.pdf		

	Item Status:	Status Date:
Bypassed - Item: Application Bypass Reason: not applicable Comments:		

	Item Status:	Status Date:
Bypassed - Item: Health - Actuarial Justification Bypass Reason: not applicable Comments:		

	Item Status:	Status Date:
Bypassed - Item: Outline of Coverage Bypass Reason: not applicable Comments:		

	Item Status:	Status Date:
Satisfied - Item: Cover Letter Comments: Attachment: AR Letter.pdf		

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Item Status: **Status
Date:**

Satisfied - Item: Responsible Officer Cert

Comments:

Attachment:

LSW Responsible Officer Cert.pdf

Item Status: **Status
Date:**

Satisfied - Item: Third Party Authorization

Comments:

Attachment:

Third party auth.pdf

Item Status: **Status
Date:**

Satisfied - Item: Statement of Variability

Comments:

Attachment:

StmtVarLSW-EPPP Rider.pdf

Arkansas Certification

This is to certify that the attached Form Number 8744(0709) has achieved a Flesch Reading Score of 80.5 and complies in all respects with the requirements of Arkansas Statute Annotated Section 66-3251 through 66-3258, cited as the Life and Disability Insurance Policy Language Simplification Act.

Life Insurance Company of the Southwest



Bennett E. Law
Designated Representative

May 29, 2009
Date



May 29, 2009

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

RE: **8744(0709), Enhanced Policy Protection Period Rider**

Life Insurance Company of the Southwest
NAIC No. 0634-65528
FEIN No. 75-0953004

For Use With: 8212AR(0305), Equity-Indexed Flexible Premium Adjustable Benefit Life Insurance.
(Approved for use in Arkansas on May 3, 2005)

8734AR(0709), Equity-Indexed Flexible Premium Adjustable Benefit Life Insurance. Unisex.
(Approved for use in Arkansas on May 20, 2009)

8387AR(0606), Indexed Flexible Premium Adjustable Benefit Life Insurance.
(Approved for use in Arkansas on January 9, 2007)

8733AR(0709), Indexed Flexible Premium Adjustable Benefit Life Insurance. Unisex.
(Approved for use in Arkansas on May 18, 2009)

Today we are submitting for your consideration a new rider to our Flexible Premium Adjustable Benefit Life Insurance products written on the contracts mentioned above. This filing has been submitted to the Texas Department of Insurance, representing our state of domicile, and is currently pending there.

Form 8744(0709), the Enhanced Policy Protection Period Rider, is a new rider that we intend to offer with new issues of underwritten business on these universal life policies. This rider ensures that a Death Benefit will be payable under the policy for as long as the rider remains in force.

The Enhanced Policy Protection Period Rider will remain in force as long as the accumulated premiums paid in excess of withdrawals and minus loan balance including accrued interest, must, on each Monthly Policy Date, equal at least the accumulated Monthly Guarantee Premiums in effect on each Monthly Policy Date since the Date of Issue. An evaluation of compliance is made on each Monthly Policy Date. If on any Monthly Policy Date the minimum premium requirement is not met, notification will be sent to the policyholder that the rider will be cancelled if a specified premium is not paid within 61 days from the date we mail said notice. Once the rider is lapsed, it cannot be reinstated, and the underlying policy may become subject to a new grace period subject to its own terms.

This rider will be made available at all issue ages 0 – 75. As noted earlier, this rider will only be made available at issue. It will be available only on Option A policies, and it will not be made available on any policy to which an Other Insured Rider is attached. This rider will be made available on all pension plans except 412(e)(3) plans.

The submitted rider scores 80.5 on the Flesch Readability Test.

Enhanced Policy Protection Period Rider - Arkansas
Life Insurance Company of the Southwest
May 29, 2009
Page 2

We have enclosed an Actuarial Memorandum for the use of this rider with the policy to which it is proposed for attachment. We have also enclosed sample data pages for this rider: the sample cover page indicates how the existence of the rider on the policy will be communicated on the first page of the data section, and then the rider has its own data page with policy-specific information. There is no charge for this rider.

Also included with this submission are the following materials:

- Actuarial Memorandum in support of the submitted form.
- Illustration Actuary and Responsible Officer Certifications.
- Sample NAIC-compliant Illustration.
- Any required Certifications or Checklists.

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



**LIFE INSURANCE COMPANY
OF THE SOUTHWEST**

Life Insurance Company of the Southwest

**Responsible Officer Certification
To Accompany Policy Form Submissions**

Regarding: 8744(0709), Enhanced Policy Protection Period Rider.

I, Elizabeth MacGowan, am the Vice President of Product Development at National Life Insurance Company (of which the Life Insurance Company of the Southwest is a subsidiary). I am an officer of the Company.

1. Life Insurance Company of the Southwest will provide its agents with disclosure information about the expense allocation method used in the product illustrations for the policy forms referenced above.
2. The scales used in insurer authorized illustrations are those scales certified by the illustration actuary.
3. Policies applied for in this state have illustrations that meet the format requirements of the illustration regulation.

Elizabeth MacGowan

Date 5/14/09

Elizabeth MacGowan
Responsible Officer for Life Insurance Company of the Southwest

Responsible Officer Certification for Submission



January 16, 2009

To Whom It May Concern:

This letter is to authorize **Michelle D. Goodwin**, Policy Forms Analyst, of National Life Insurance Company, Montpelier, Vermont, as a **Designated Representative** of Life Insurance Company of the Southwest to submit product filings on their behalf.

All questions and comments regarding this filing should first be addressed to Mrs. Goodwin. I stand ready, however, to answer for Life Insurance Company of the Southwest directly should that need arise.

Mrs. Goodwin may be contacted at:

National Life Insurance Company
One National Life Drive
Montpelier, Vermont 05604
Phone: 802-229-7441
Fax: 802-229-3743

Life Insurance Company of the Southwest thanks you for your consideration in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Mayo", written over the word "Sincerely,".

Wade H. Mayo
President & Chief Executive Officer

*Wade H. Mayo
President and CEO*

March 23, 2009

To Whom It May Concern:

This letter is to authorize **Nancy W. Winings**, 2nd Vice President – Product Development, of National Life Insurance Company, Montpelier, Vermont, as a **Designated Representative** of Life Insurance Company of the Southwest to submit product filings on their behalf.

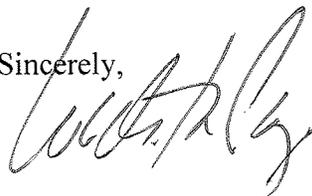
All questions and comments regarding this filing should first be addressed to Mrs. Winings. I stand ready, however, to answer for Life Insurance Company of the Southwest directly should that need arise.

Mrs. Winings may be contacted at:

National Life Insurance Company
One National Life Drive
Montpelier, Vermont 05604
Phone: 802-229-3917
Fax: 802-229-7197

Life Insurance Company of the Southwest thanks you for your consideration in this matter.

Sincerely,



Wade H. Mayo

January 16, 2009

To Whom It May Concern:

This letter is to authorize **Bennett E. Law**, Vice President – Policy Forms & General Services, of National Life Insurance Company, Montpelier, Vermont, as a **Designated Representative** of Life Insurance Company of the Southwest to submit product filings on their behalf.

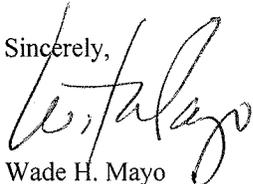
All questions and comments regarding this filing should first be addressed to Mr. Law. I stand ready, however, to answer for Life Insurance Company of the Southwest directly should that need arise.

Mr. Law may be contacted at:

National Life Insurance Company
One National Life Drive
Montpelier, Vermont 05604
Phone: 802-229-3675
Fax: 802-229-3743

Life Insurance Company of the Southwest thanks you for your consideration in this matter.

Sincerely,



Wade H. Mayo
President & Chief Executive Officer

**Statement of Variability for Data Page
For Form 8744(0709)**

The Data Pages within the submitted filing contain brackets, used to designate variable items that may be unique for each policyholder or issue of the submitted rider.

Descriptions of the bracketed items follow:

EFFECTIVE DATE: This provides the Effective Date of the policy, both on the Cover and within the Data Pages.

POLICY NUMBER: This 7-digit number is the unique policy number by which we distinguish each policy issued on this form. This number appears on the Cover and on the Data Pages.

MATURITY DATE: This is the date on which the policy matures, and will be specific to the circumstances of each policy.

INSURED: This is the Insured's name, and will be unique to each Insured. This appears within the Data Pages.

ISSUE AGE: This is the issue age of the named Insured and appears within the Data Pages.

FACE AMOUNT: This amount will be unique to the policy based on each individual situation and appears within the Data Pages.

MONTHLY POLICY DATE: This can take the variables of the "1st" through the "31st".

DEATH BENEFIT OPTION: This can take the variables of "A" or "B".

OWNER: This is the Owner's name, and will be unique to each Owner. This appears within the Data Pages. The statement "As stated in the application unless later changed" may appear to identify the owner, unless or until a revised Data Page is prepared to specify a new owner. In these circumstances, the name of the new owner will be stated, such name being unique to each owner.

BENEFICIARY: The statement "As stated in the application unless later changed" will appear to identify the beneficiary, unless or until a revised Data Page is prepared to specify a new beneficiary. In these circumstances, the name of the new beneficiary will be stated, such name being unique to each beneficiary.

MINIMUM MONTHLY PREMIUM: This is the lowest premium that will be accepted on this policy.

MONTHLY GUARANTEED PREMIUM: This is the amount when the rider is attached on this policy.

PLANNED PERIODIC PREMIUM: This is the premium that the applicant has asked be billed. It's value is unique to the interests of each applicant.

PREMIUM INTERVAL: This denotes the number of premiums payable each year, as requested by the applicant in establishing his or her planned periodic premium and premium interval and can take the variables of "AT ISSUE", "ANNUALLY", "SEMI-ANNUALLY", "QUARTERLY", "MONTHLY" or "CHECK-O-MATIC".

FOR PREMIUM PAYMENT PERIOD: This date varies with values of the Effective Date and the Maturity Date.

LOAN INTEREST RATE: This percentage varies from 3.00% to the Published Monthly Average of the Moody's Corporate Bond Yield Average – Monthly Average Corporates for the calendar month ending two months before the calendar month in which the Policy Anniversary occurs, but not exceeding eight percent (8%) per annum.

ENHANCED POLICY PROTECTION PERIOD IS IN EFFECT THROUGH: This is the date when the rider is no longer in effect.