

SERFF Tracking Number: INGD-126198353 State: Arkansas
Filing Company: Security Life of Denver Insurance Company State Tracking Number: 42989
Company Tracking Number: 1173 2% GID RATE
TOI: L09I Individual Life - Flexible Premium Sub-TOI: L09I.002 Joint (Last Survivor)
Adjustable Life
Product Name: 1173-01/07 2% Guranteed Interest Rate Change
Project Name/Number: 1173-01/07 2% Guranteed Interest Rate Change/1173-01/07 2% Guranteed Interest Rate Change

Filing at a Glance

Company: Security Life of Denver Insurance Company

Product Name: 1173-01/07 2% Guranteed Interest Rate Change SERFF Tr Num: INGD-126198353 State: Arkansas

Interest Rate Change
TOI: L09I Individual Life - Flexible Premium SERFF Status: Closed-Accepted State Tr Num: 42989
Adjustable Life For Informational Purposes

Sub-TOI: L09I.002 Joint (Last Survivor) Co Tr Num: 1173 2% GID RATE State Status: Filed-Closed
Filing Type: Form Reviewer(s): Linda Bird

Authors: Wendy Paquin, Terry

Stumpf, Jackie Williams, EDS

EDSSupport, Laura Sampair

Date Submitted: 07/21/2009

Disposition Date: 07/27/2009
Disposition Status: Accepted For Informational Purposes

Implementation Date Requested: 12/01/2009

State Filing Description:

Implementation Date:

General Information

Project Name: 1173-01/07 2% Guranteed Interest Rate Change
Project Number: 1173-01/07 2% Guranteed Interest Rate Change
Requested Filing Mode: Informational

Explanation for Combination/Other:
Submission Type: New Submission
Overall Rate Impact:
Filing Status Changed: 07/27/2009

Deemer Date:
Submitted By: Wendy Paquin
Filing Description:
July 21, 2009

Status of Filing in Domicile: Not Filed
Date Approved in Domicile:
Domicile Status Comments: This filing is not required in Colorado, our state of domicile.
Market Type: Individual
Group Market Size:
Group Market Type:
Explanation for Other Group Market Type:
State Status Changed: 07/27/2009
Created By: Wendy Paquin
Corresponding Filing Tracking Number:

Insurance Commissioner
Department of Insurance

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Compliance Life & Health

1200 West Third Street
Little Rock, Arkansas 72201-1904

Re: Security Life of Denver Insurance Company
NAIC #68713 FEIN #84-0499703

Form Number:

Reduce Minimum Guaranteed Interest Rate on 1173-01/07 Last Survivor Flexible Premium Adjustable Universal Life Insurance Policy

Attention Policy Form Approval Division:

We submit the above referenced form for your information. The form does not replace any previously approved form. The form does not contain any unusual or controversial items from the standpoint of industry standards.

We are exempt from filing in Colorado, our state of domicile, pursuant to Colorado Bulletin B-4.1 (May 8, 2007).

The information bracketed in the form is subject to change.

The following changes to the Schedule pages will be effective for all new issues beginning on or after December 1, 2009:

1. Reduced the Guaranteed Minimum Interest Rate from 3% to 2%
2. Bracketed the Guaranteed Minimum Interest Rate
3. Changed the revision date in the lower left hand corner on this page only
4. Revised Surrender Charges
5. Changed the trigger for crediting of the Guaranteed Additional Interest Crediting Bonus Rate (changed from 3% to 2%)

No other changes were made to the policy.

The following previously approved form(s) will be marketed with the submitted policy form (approval date(s) provided):

1173-01/07 - Last Survivor Flexible Premium Adjustable Universal Life Insurance Policy - 11/06/2006
1176-08/08 - Flexible Premium Adjustable Universal Life Insurance Policy - 07/30/2008
1177-10/08 - Flexible Premium Adjustable Universal Life Insurance Policy - 09/081/2008

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Unless otherwise informed, we reserve the right to alter the layout of the enclosed form, including sequential ordering of the sections, color, and type font and size, and any changes necessary to comply with your state requirements, but we will only do so if such changes are within the allowable parameters or requirements set forth in your statutes.

To the best of our knowledge, the form complies with the laws and regulations of the insurance department of your state.

Sincerely,

Wendy Paquin, FLMI, CLU
Senior Contract Analyst
(612) 342-3595
(612) 342-7531 (fax)
wendy.paquin@us.ing.com

Company and Contact

Filing Contact Information

Wendy Paquin, wendy.paquin@us.ing.com
20 Washington Ave South 612-342-3595 [Phone]
Minneapolis, MN 55401 612-342-7531 [FAX]

Filing Company Information

Security Life of Denver Insurance Company CoCode: 68713 State of Domicile: Colorado
1290 Broadway Group Code: 229 Company Type: Life Insurance
Denver, CO 80203-5699 Group Name: State ID Number:
(303) 860-2348 ext. [Phone] FEIN Number: 84-0499703

Filing Fees

Fee Required? Yes
Fee Amount: \$150.00
Retaliatory? No
Fee Explanation: \$50 per form x 3 forms = \$150
Per Company: No

SERFF Tracking Number: *INGD-126198353* State: *Arkansas*
Filing Company: *Security Life of Denver Insurance Company* State Tracking Number: *42989*
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COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Security Life of Denver Insurance Company	\$150.00	07/21/2009	29330141

SERFF Tracking Number: *INGD-126198353* State: *Arkansas*
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Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Accepted For Informational Purposes	Linda Bird	07/27/2009	07/27/2009

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Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Flesch Certification		Yes
Supporting Document	Application		No
Supporting Document	Health - Actuarial Justification		No
Supporting Document	Outline of Coverage		No
Supporting Document	Actuarial Memorandums		No
Supporting Document	Schedule Page		Yes

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Supporting Document Schedules

	Item Status:	Status Date:
<p>Satisfied - Item: Flesch Certification Comments: Attachments: AR Consent to Submit Rates - 1173.pdf AR Consent to Submit Rates - 1176.pdf AR Consent to Submit Rates - 1177.pdf AR Certification Reg 19 and 49.pdf</p>		
<p>Bypassed - Item: Application Bypass Reason: Not applicable. Comments:</p>		
<p>Bypassed - Item: Outline of Coverage Bypass Reason: Not applicable. Comments:</p>		
<p>Satisfied - Item: Schedule Page Comments: Attachments: 1173 Schedule Page Basic.pdf 1176 Schedule Page Basic.pdf 1177 Schedule Pages Basic.pdf</p>		

ARKANSAS EXHIBIT A (REVISED)

CONSENT TO SUBMIT RATES
AND/OR COST BASES FOR APPROVAL

The Security Life of Denver Insurance Company ("Company") of Denver, Colorado does hereby
(Company Name) (City and State)

consent and agree:

A) that all premium rates and/or cost bases both "maximum" and current or projected", used in relation to policy form number 1173-01/07 must be filed with the Insurance Commissioner for the State of Arkansas ("Commissioner") at least sixty (60) days prior to their proposed effective date. Such rates and/or cost bases shall be deemed effective sixty (60) days after they are filed with the consent Commissioner, unless the Commissioner shall approve or disapprove such rates and/or cost bases prior to the expiration of sixty (60) days.

or

B) that where the policy is a flexible or indeterminate premium whole life policy which provides for frequent changes in interest rates based on financial market conditions, the company may file a range of rates it will stay within and will notify the Department at least sixty (60) days prior to any change in the range of rates. The company must also document the method used to calculate its premium and range of rates.

Security Life of Denver Insurance Company
(Company Name)



By Joseph F. Acri, ASA, MAAA
(Name)

Associate Actuary
(Title or Position)

ARKANSAS EXHIBIT A (REVISED)

CONSENT TO SUBMIT RATES
AND/OR COST BASES FOR APPROVAL

The Security Life of Denver Insurance Company ("Company") of Denver, Colorado does hereby
(Company Name) (City and State)

consent and agree:

A) that all premium rates and/or cost bases both "maximum" and current or projected", used in relation to policy form number 1176-08/08 must be filed with the Insurance Commissioner for the State of Arkansas ("Commissioner") at least sixty (60) days prior to their proposed effective date. Such rates and/or cost bases shall be deemed effective sixty (60) days after they are filed with the consent Commissioner, unless the Commissioner shall approve or disapprove such rates and/or cost bases prior to the expiration of sixty (60) days.

or

B) that where the policy is a flexible or indeterminate premium whole life policy which provides for frequent changes in interest rates based on financial market conditions, the company may file a range of rates it will stay within and will notify the Department at least sixty (60) days prior to any change in the range of rates. The company must also document the method used to calculate its premium and range of rates.

Security Life of Denver Insurance Company
(Company Name)



By Erica Wilson, FSA, MAAA
(Name)

Associate Actuary
(Title or Position)

ARKANSAS EXHIBIT A (REVISED)

CONSENT TO SUBMIT RATES
AND/OR COST BASES FOR APPROVAL

The Security Life of Denver Insurance Company ("Company") of Denver, Colorado does hereby
(Company Name) (City and State)

consent and agree:

A) that all premium rates and/or cost bases both "maximum" and current or projected", used in relation to policy form number 1177-10/08 must be filed with the Insurance Commissioner for the State of Arkansas ("Commissioner") at least sixty (60) days prior to their proposed effective date. Such rates and/or cost bases shall be deemed effective sixty (60) days after they are filed with the consent Commissioner, unless the Commissioner shall approve or disapprove such rates and/or cost bases prior to the expiration of sixty (60) days.

or

B) that where the policy is a flexible or indeterminate premium whole life policy which provides for frequent changes in interest rates based on financial market conditions, the company may file a range of rates it will stay within and will notify the Department at least sixty (60) days prior to any change in the range of rates. The company must also document the method used to calculate its premium and range of rates.

Security Life of Denver Insurance Company
(Company Name)

By:



Lauren E. Berry, FSA, MAAA
(Name)

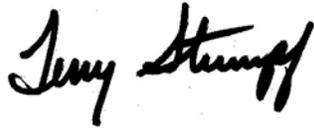
Actuary
(Title or Position)

**ARKANSAS
CERTIFICATION**

RE: 2% Guaranteed Interest Rate Change for
1176-08/08, 1177-10/08 and 1173-01/07

As an officer of Security Life of Denver Insurance Company, I certify that this submission meet the provisions of Regulation 19 (unfair sex discrimination in the sale of life insurance), Regulation 49 (guaranty association notice) and all applicable requirements of the Arkansas Insurance Department.

SECURITY LIFE OF DENVER INSURANCE COMPANY



By: _____
Terry Stumpf, Assistant Secretary

Date: July 1, 2009

SCHEDULE (CONTINUED)

REFUND OF SALES CHARGE

- | | | | |
|----|---|-----------------|--|
| a. | Guaranteed Minimum Refund of Sales Charge. See the Refund of Sales Charge section for details | Policy year 1 | 5.0% of total eligible premium paid |
| | | Policy year 2 | 2.5% of total eligible premium paid in the first policy year |
| | | Policy years 3+ | 0.0% |

POLICY TRANSACTION CHARGES

- | | | |
|----|--------------------------------|---|
| a. | Policy Illustrations: | \$25.00 charge for each illustration after the first in a policy year |
| b. | Policy Withdrawal Service Fee: | See the Partial Withdrawal section below for details |

POLICY LOANS

- | | | | |
|----|---|--|-------|
| a. | Guaranteed Maximum Policy Loan Interest Rate: | Policy years 1-10 | 3.75% |
| | | Policy years 11+ | 3.15% |
| b. | Minimum Policy Loan Amount: | \$100 | |
| c. | Maximum Policy Loan Amount: | See the Policy Loans section for details | |

PARTIAL WITHDRAWALS

- | | | |
|----|------------------------------------|---|
| a. | Minimum Partial Withdrawal Amount: | \$100 |
| b. | Maximum Partial Withdrawal Amount: | Amount which will leave \$500.00 as the Net Account Value |
| c. | Partial Withdrawal Service Fee: | \$10.00 |
| d. | Limit on Partial Withdrawals: | Twelve (12) per policy year |

GUARANTEED MINIMUM INTEREST RATE

- | | | | |
|----|-----------------------------------|--|---------|
| a. | Guaranteed Minimum Interest Rate: | Policy years 1+ | [2.00]% |
| b. | Credited Interest Rate: | Interest is credited at the guaranteed rate shown or may be credited at a higher rate. Any higher rate is guaranteed to be in effect for at least 12 months after each policy anniversary. | |

ADDITIONAL INTEREST CREDITING BONUS RATE

- | | | | |
|----|--|--------------------|-------|
| a. | Non-Guaranteed Additional Interest Crediting Bonus Rate: | Policy years 1-10 | 0.00% |
| | | Policy years 11-15 | 0.50% |
| | | Policy years 16+ | 0.60% |

SCHEDULE (CONTINUED)

POLICY FEATURES AND BENEFITS

a. Policy Loans

- | | | | |
|----|--|---------------------------------------|----------------|
| 1. | Guaranteed Maximum Interest Rate Charged on Loans | Policy years 1-10
Policy years 11+ | 4.00%
3.15% |
| 2. | Guaranteed Minimum Interest Rate Credited on Loans | 3.00% per year | |
| 3. | Minimum Loan Amount | \$500 | |
| 4. | Maximum Loan Amount | See the Loans section | |

b. Partial Withdrawals

- | | | |
|----|-----------------------------------|--|
| 1. | Minimum Partial Withdrawal Amount | \$500 |
| 2. | Maximum Partial Withdrawal Amount | Amount that will leave \$500.00 as the Net Account Value |
| 3. | Limit on Partial Withdrawals | Twelve (12) in a policy year |

c. Guaranteed Minimum Interest Rate [2.00%] per year

d. Guaranteed Additional Interest Crediting Bonus Rate Policy year 11+ 0.05%
(applicable to the unborrowed portion of the Account Value)

e. Guaranteed Minimum Surrender Value Enhancement Percentage
(of first year premium paid)

Policy year 1	3.00%
Policy year 2	2.00%
Policy year 3	1.00%
Policy year 4+	0.00%

(Print for FUW version)

SCHEDULE (CONTINUED)

GUARANTEED MAXIMUM POLICY CHARGES

- a. Guaranteed Maximum Premium Expense Charge** (of all premium) 10%
- b. Guaranteed Maximum Monthly Charges**
 - 1. Cost of Insurance Charge See the Policy Table of Guaranteed Rates Schedule
 - 2. Policy Charge \$30.00
 - 3. Administrative Charge per \$1,000 of Stated Death Benefit [Segment years 1-20 \$0.30600]
[Segment years 21+ \$0.00000]
- c. Guaranteed Maximum Transaction Charges**
 - 1. Partial Withdrawal Service Fee (per partial withdrawal) \$10.00
 - 2. Excess Policy Illustration Fee (for each illustration after the first in a policy year) \$25.00

d. Surrender Charge
 These are the maximum surrender charges for the initial Stated Death Benefit shown in your Schedule for Segment #1. These charges may change if there is an increase or decrease in the Stated Death Benefit. The surrender charge is zero at the beginning of the 10th year following a Segment's effective date.

If surrender charges are applicable, a decrease in the Stated Death Benefit will result in the deduction of a surrender charge from the Account Value. For details, see the Requested Decreases, Partial Withdrawal Provisions and Surrender Provisions sections.

Segment Year	Maximum Surrender Charge Amount
1	[\$1,006.00]
2	[\$894.00]
3	[\$782.00]
4	[\$670.00]
5	[\$558.00]
6	[\$446.00]
7	[\$334.00]
8	[\$222.00]
9	[\$110.00]
10+	[\$0.00]

(Print for GI version)

SCHEDULE (CONTINUED)

GUARANTEED MAXIMUM POLICY CHARGES

- a. Guaranteed Maximum Premium Expense Charge** (of all premium) 10%

- b. Guaranteed Maximum Monthly Charges**
 - 1. Cost of Insurance Charge See the Policy Table of Guaranteed Rates Schedule
 - 2. Policy Charge \$30.00
 - 3. Administrative Charge per \$1,000 of Stated Death Benefit [Segment years 1-20 \$0.11760]
[Segment years 21+ \$0.00000]

- c. Guaranteed Maximum Transaction Charges**
 - 1. Partial Withdrawal Service Fee (per partial withdrawal) \$10.00
 - 2. Excess Policy Illustration Fee (for each illustration after the first in a policy year) \$25.00

d. Surrender Charge
These are the maximum surrender charges for the initial Stated Death Benefit shown in your Schedule for Segment #1. These charges may change if there is an increase or decrease in the Stated Death Benefit. The surrender charge is zero at the beginning of the 10th year following a Segment's effective date.

If surrender charges are applicable, a decrease in the Stated Death Benefit will result in the deduction of a surrender charge from the Account Value. For details, see the Requested Decreases, Partial Withdrawal Provisions and Surrender Provisions sections.

Segment Year	Maximum Surrender Charge Amount
1	[\$1,006.00]
2	[\$894.00]
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4	[\$670.00]
5	[\$558.00]
6	[\$446.00]
7	[\$334.00]
8	[\$222.00]
9	[\$110.00]
10+	[\$0.00]

SCHEDULE (CONTINUED)

POLICY FEATURES AND BENEFITS

a. Policy Loans

1.	Guaranteed Maximum Interest Rate Charged on Loans	Policy years 1-10 Policy years 11+	4.00% 3.15%
2.	Guaranteed Minimum Interest Rate Credited on Loans	3.00% per year	
3.	Minimum Loan Amount	\$500.00	
4.	Maximum Loan Amount	100% of the Net Surrender Value minus 3 times the Monthly Deduction	

b. Partial Withdrawals

1.	Minimum Partial Withdrawal Amount	\$500.00	
2.	Maximum Partial Withdrawal Amount	Amount that will leave \$500.00 as the Net Surrender Value	
3.	Limit on Partial Withdrawals	Twelve (12) in a policy year	

c. Guaranteed Minimum Interest Rate [2.00%] per year

d. Guaranteed Additional Interest Crediting Bonus Rate Policy years 15+ 0.05%

(applicable to the unborrowed portion of the Account Value if the credited interest rate is greater than 2.00%)

e. Special Continuation Period Policy years 1-9