

SERFF Tracking Number: AEGA-126258572 State: Arkansas
Filing Company: Monumental Life Insurance Company State Tracking Number: 43171
Company Tracking Number: VVAP U 1101 R (01/10)
TOI: A03I Individual Annuities - Deferred Variable Sub-TOI: A03I.002 Flexible Premium
Product Name: VVAP U 1101 R (01/10)
Project Name/Number: "Right To Cancel" Sticker/VVAP U 1101 R (01/10)

Filing at a Glance

Company: Monumental Life Insurance Company

Product Name: VVAP U 1101 R (01/10)

TOI: A03I Individual Annuities - Deferred Variable

Sub-TOI: A03I.002 Flexible Premium

SERFF Tr Num: AEGA-126258572 State: Arkansas

SERFF Status: Closed-Approved-Closed State Tr Num: 43171

Co Tr Num: VVAP U 1101 R (01/10)

State Status: Approved-Closed

Filing Type: Form

Author: Laurie Bascom

Date Submitted: 08/07/2009

Reviewer(s): Linda Bird

Disposition Date: 08/12/2009

Disposition Status: Approved-Closed

Implementation Date Requested: On Approval

Implementation Date:

State Filing Description:

General Information

Project Name: "Right To Cancel" Sticker

Project Number: VVAP U 1101 R (01/10)

Requested Filing Mode: Review & Approval

Explanation for Combination/Other:

Submission Type: New Submission

Overall Rate Impact:

Filing Status Changed: 08/12/2009

Status of Filing in Domicile: Not Filed

Date Approved in Domicile:

Domicile Status Comments:

Market Type: Individual

Group Market Size:

Group Market Type:

Explanation for Other Group Market Type:

State Status Changed: 08/12/2009

Created By: Laurie Bascom

Corresponding Filing Tracking Number:

Deemer Date:

Submitted By: Laurie Bascom

Filing Description:

August 7, 2009

State of Arkansas

Department of Insurance

1200 West Third Street

Little Rock, AR 72201-1904

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Project Name/Number: "Right To Cancel" Sticker/VVAP U 1101 R (01/10)
Attn: Policy Examination Division (Life and Annuity)

Re: Monumental Life Insurance Company
NAIC #468-66281
VVAP U 1101 R (01/10) - "Right to Cancel" Sticker
SERFF Tracking Number - AEGA-126258572

Dear Sir or Madam:

Please find attached the above referenced form for your review and approval. This is a new form and is not intended to replace any form previously approved by your Department.

This sticker will be used with policy form VVAP U 1101, which was approved by your Department on 05/14/02. This form is intended to replace the Right to Cancel provision on the face page of the above mentioned policy when it is issued as a replacement. To assist you in this submission, the face page including the new sticker is attached.

We would appreciate your review and approval of this form.

Sincerely,

Monumental Life Insurance Company

Laurie Bascom
Filing Analyst II
TCM Regulatory Filing Dept.
Phone: 319-355-6813
Fax: 319-355-6820
Email: lbascom@aegonusa.com

Company and Contact

Filing Contact Information

Laurie Bascom, Forms Filing Analyst II

lbascom@aegonusa.com

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4333 Edgewood Road, NE 319-355-6813 [Phone]
 Cedar Rapids, IA 52499 319-355-6820 [FAX]

Filing Company Information

Monumental Life Insurance Company CoCode: 66281 State of Domicile: Iowa
 4333 Edgewood Road N.E. Group Code: 468 Company Type: Life and Annuity
 Cedar Rapids, IA 52499 Group Name: State ID Number:
 (800) 553-5957 ext. [Phone] FEIN Number: 52-0419790

Filing Fees

Fee Required? Yes
 Fee Amount: \$20.00
 Retaliatory? No
 Fee Explanation: 1 form X \$20
 Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Monumental Life Insurance Company	\$20.00	08/07/2009	29694612

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Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved-Closed	Linda Bird	08/12/2009	08/12/2009

Objection Letters and Response Letters

Objection Letters				Response Letters		
Status	Created By	Created On	Date Submitted	Responded By	Created On	Date Submitted
Pending Industry Response	Linda Bird	08/12/2009	08/12/2009	Laurie Bascom	08/12/2009	08/12/2009

SERFF Tracking Number: AEGA-126258572 *State:* Arkansas
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Disposition

Disposition Date: 08/12/2009

Implementation Date:

Status: Approved-Closed

Comment:

Rate data does NOT apply to filing.

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Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Flesch Certification		Yes
Supporting Document	Application		No
Supporting Document	Life & Annuity - Acturial Memo		No
Supporting Document	Sample Face Page		Yes
Supporting Document	Approval of VVAP U 1101		Yes
Form	"Right To Cancel" Sticker		Yes

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Objection Letter

Objection Letter Status Pending Industry Response
Objection Letter Date 08/12/2009
Submitted Date 08/12/2009
Respond By Date 09/14/2009

Dear Laurie Bascom,

This will acknowledge receipt of the captioned filing.

Objection 1

No Objections

Comment: In checking our records we do not find policy form VVAP U 1101 approved by our Department on 05/14/02.
Please advise.

Please feel free to contact me if you have questions.

Sincerely,

Linda Bird

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Response Letter

Response Letter Status Submitted to State
Response Letter Date 08/12/2009
Submitted Date 08/12/2009

Dear Linda Bird,

Comments:

In response to your objection letter dated 08/12/09:

Response 1

Comments: I have attached a copy of the Arkansas approval of VVAP U 1101.

Related Objection 1

Comment:

In checking our records we do not find policy form VVAP U 1101 approved by our Department on 05/14/02.

Please advise.

Changed Items:

Supporting Document Schedule Item Changes

Satisfied -Name: Approval of VVAP U 1101

Comment:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Please let me know if you have any further questions or concerns.

Thank you,
Laurie Bascom

Sincerely,
Laurie Bascom

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Form Schedule

Lead Form Number:

Schedule Item Status	Form Number	Form Type	Form Name	Action	Action Specific Data	Readability	Attachment
	VVAP U 1101 R (01/10)	Other	"Right To Cancel" Sticker	Initial			VVAP U 1101 R (0110).pdf

RIGHT TO CANCEL CONTRACT – FREE LOOK PERIOD

If for any reason the Owner is not satisfied with the Contract, he or she may return it to the Company within 30 days after receipt of the Contract (plus 5 days mailing time). It may be returned by delivering or mailing it to Vanguard Annuity and Insurance Services, P.O. Box 1105, Valley Forge, PA 19482. If returned, the Contract shall be void from the Contract Date. The Company will refund the Accumulated Value.

VVAP U 1101 R (01/10)

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Supporting Document Schedules

	Item Status:	Status Date:
Satisfied - Item: Flesch Certification		
Comments:		
Attachment: Arkansas Cert 3 (Reg 19).pdf		

	Item Status:	Status Date:
Bypassed - Item: Application		
Bypass Reason: n/a		
Comments:		

	Item Status:	Status Date:
Bypassed - Item: Life & Annuity - Acturial Memo		
Bypass Reason: n/a		
Comments:		

	Item Status:	Status Date:
Satisfied - Item: Sample Face Page		
Comments:		
Attachment: Sample Face Page.pdf		

	Item Status:	Status Date:
Satisfied - Item: Approval of VVAP U 1101		
Comments:		
Attachment: AR approval VVAP U 1101.pdf		

CERTIFICATION OF COMPLIANCE

Company Name: Monumental Life Insurance Company

Form Title(s): "Right To Cancel" Sticker

Form Number(s): VVAP U 1101 R (01/10)

I hereby certify that to the best of my knowledge and belief, the above form(s) and submission complies with Reg.19 s 10B, as well as the other laws and regulations of the State of Arkansas.



Karen Alvarado
Vice President, Compliance Director

August 7, 2009

Date

Monumental Life Insurance Company

Variable Annuity Contract

Monumental Life Insurance Company
(Herein referred to as the "Company")
An Iowa Stock Company
Home Office: Cedar Rapids, Iowa
Administrative Office: Valley Forge, Pennsylvania 19482

FLEXIBLE PREMIUM VARIABLE ANNUITY NON-PARTICIPATING

Monumental Life Insurance Company (the "Company") has issued this Contract in consideration of the Initial Premium Payment.

This is a legal Contract between the Owner and the Company. Monumental Life Insurance Company agrees to provide the benefits and other rights described in this Contract in accordance with this Contract. Please read it carefully.

This Contract permits the accumulation of funds on a tax-deferred basis and provides a periodic Annuity Payment for the life of the Annuitant or for a certain period of time. Payments start on the Income Date.

Benefits based on the performance of the Separate Account are variable and are not guaranteed as to amount.

RIGHT TO CANCEL CONTRACT – FREE LOOK PERIOD

If for any reason the Owner is not satisfied with the Contract, he or she may return it to the Company within 30 days after receipt of the Contract (plus 5 days mailing time). It may be returned by delivering or mailing it to Vanguard Annuity and Insurance Services, P.O. Box 1105, Valley Forge, PA 19482. If returned, the Contract shall be void from the Contract Date. The Company will refund the Accumulated Value.

VVAP U 1101 R (01/10)

Signed for the Company at the Home Office.



H. Stacey Boyer
Secretary



Henry S. Hagan
President

VVAP U 1101

Financial Markets Division

400 West Market Street
Post Office Box 32830
Louisville, Kentucky 40232



December 6, 2001

Mr. John Shields
Arkansas Department of Insurance
1200 West 3rd Street
Little Rock, Arkansas 72201-1904



RE: PEOPLES BENEFIT LIFE INSURANCE COMPANY
NAIC #468-66605; FEIN #43-0378030
1) FORM #VVAP U 1101—FLEXIBLE PREMIUM VARIABLE ANNUITY CONTRACT
2) FORM #VVAP SU 1101—ANNUAL STEP-UP DEATH BENEFIT RIDER
3) FORM #VVAP RP 1101—RETURN OF PREMIUM DEATH BENEFIT RIDER

Dear Mr. Shields:

Enclosed for your review and approval are the above-referenced Contract and Riders. These are new forms. Also enclosed are the corresponding forms and certifications supporting this submission. A filing fee is also included with this submission, if applicable. These forms have been simultaneously submitted to our domicile state of Iowa.

Form #VVAP U 1101—Flexible Premium Variable Annuity Contract – This contract provides a means of investing on a tax-deferred basis in thirteen portfolios of the Vanguard Variable Insurance Fund. The contract is intended for retirement savings or other long-term investment purposes. A minimum premium of \$5,000 is generally required to make a contract purchase, and the contract also provides a death benefit.

Form #VVAP RP 1101—Return of Premium Death Benefit Rider – This rider provides a death benefit of accumulated value or the sum of all premium payments – whichever is greater. The cost for this benefit is an additional 0.05% per year, charged quarterly at a rate of 0.0125%. The client can only choose this rider upon the purchase of a new contract. They may opt out of the provision at a later date, but cannot add it back to the contract.

Form #VVAP SU 1101—Annual Step-Up Death Benefit Rider – This rider provides a death benefit of accumulated value, the sum of all premium payments, or the highest accumulated value on any contract anniversary prior to the annuitant's 80th birthday, whichever is greater. The cost for this benefit is an additional 0.12% per year, charged quarterly at a rate of 0.03%. The client can only choose this rider upon the purchase of a new contract. They may opt out of the provision at a later date, but cannot add it back to the contract.

We have also enclosed the Actuarial Demonstration that supports this submission as well as a draft prospectus. This is an "app-less" contract. That is, the enclosed contract does not require the inclusion or attachment of an application in order to be complete or an entire contract. Therefore, we have not enclosed an application with this submission. Accordingly, the enclosed contract's The Contract provision is worded to reflect this status.

December 7, 2001
Mr. Shields
Page 2

For the return of the enclosed duplicate forms with your Department's stamp indicating an approval, we have enclosed a post-paid envelope. If you need to contact me about this submission, I may be reached by collect call at (502) 560-2239, by Email at Dsesit@aegonusa.com, by fax at (502) 560-2823 or by regular mail using the address provided on this letter. Your timely review and approval of these submitted forms will be greatly appreciated.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Dan Sesit', with a large, stylized flourish at the end.

Dan Sesit, HIA, MHP
Senior Policy Analyst
Regulatory Filing Department

Enclosures