

SERFF Tracking Number: AGNN-126459074 State: Arkansas
 Filing Company: The Variable Annuity Life Insurance Company State Tracking Number: 44625
 Company Tracking Number: PDPB-110
 TOI: A02.11 Individual Annuities- Deferred Non- Sub-TOI: A02.11.002 Flexible Premium
 Variable and Variable
 Product Name: PDPB-110
 Project Name/Number: /

Filing at a Glance

Company: The Variable Annuity Life Insurance Company

Product Name: PDPB-110

SERFF Tr Num: AGNN-126459074 State: Arkansas

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

SERFF Status: Closed-Approved- State Tr Num: 44625

Closed

Sub-TOI: A02.11.002 Flexible Premium

Co Tr Num: PDPB-110

State Status: Approved-Closed

Filing Type: Form

Reviewer(s): Linda Bird

Author: Angie Fox

Disposition Date: 01/21/2010

Date Submitted: 01/19/2010

Disposition Status: Approved-
 Closed

Implementation Date Requested: On Approval

Implementation Date:

State Filing Description:

General Information

Project Name:

Status of Filing in Domicile: Pending

Project Number:

Date Approved in Domicile:

Requested Filing Mode:

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: 01/21/2010

Explanation for Other Group Market Type:

State Status Changed: 01/21/2010

Deemer Date:

Created By: Angie Fox

Submitted By: Angie Fox

Corresponding Filing Tracking Number:

Filing Description:

The above-referenced form is enclosed and submitted for your review and approval. This filing does not contain any unusual or controversial items. The form is new and does not replace any forms previously approved by your Department.

To the best of our knowledge, information and belief, the forms submitted herewith are in compliance with the provisions of the insurance laws, rules, regulations and bulletins of your state. Such form contains no provisions previously disapproved by your Department. This endorsement may be attached to and made a part of our annuity contracts as approved in your state.

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The above referenced form is very similar to Form PDPB-407, approved by your department on June 19, 2007. The primary difference is this new endorsement revises the period of time in which a deposit is eligible for the Premium Bonus. For a deposit to be eligible, it must now be made within the first 90-days of the Contract.

Form PDPB-110 is a Premium Enhancement Credit Endorsement. With the endorsement, the Company will add a Premium Enhancement Credit to the Accumulation Value upon receipt of an Eligible Deposit as defined therein. This endorsement will be used with our Portfolio Director Fixed and Variable Annuity policy forms both individual and group as approved by your Department.

We certify that we are in compliance with Regulations 19 and 49 as well as AR. Code Ann. 23-79-138.

Company and Contact

Filing Contact Information

Angie Fox, angie.fox@aigretirement.com
 2919 Allen Parkway, L10-30 713-831-6050 [Phone]
 Houston, TX 77019 713-831-6932 [FAX]

Filing Company Information

The Variable Annuity Life Insurance Company	CoCode: 70238	State of Domicile: Texas
2929 Allen Parkway, L10-30	Group Code: 11	Company Type:
Houston, TX 77019	Group Name:	State ID Number:
(713) 831-1305 ext. [Phone]	FEIN Number: 74-1625348	

Filing Fees

Fee Required?	Yes
Fee Amount:	\$100.00
Retaliatory?	Yes
Fee Explanation:	the fee required for this filing in our domicile state of Texas is \$100, therefore \$100 is included with this submission.
Per Company:	No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
The Variable Annuity Life Insurance Company	\$100.00	01/19/2010	33630708

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Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved- Closed	Linda Bird	01/21/2010	01/21/2010

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Disposition

Disposition Date: 01/21/2010

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		No
Supporting Document	Application		No
Supporting Document	Life & Annuity - Acturial Memo		No
Supporting Document	statement of variability		No
Form	Premium Enhancement Credit		No
	Endorsement on Eligible Deposits		

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Form Schedule

Lead Form Number: PDPB-110

Schedule Item Status	Form Number	Form Type	Form Name	Action	Action Specific Data	Readability	Attachment
	PDPB-110	Certificate	Premium Amendmen t, Insert Page, Endorseme nt or Rider	Initial		50.500	PDPB- 110_filedversi on.pdf

THE VARIABLE ANNUITY LIFE INSURANCE COMPANY (VALIC)
HOUSTON, TEXAS
[2929 Allen Parkway
Houston, TX 77019]

Premium Enhancement Credit Endorsement on Eligible Deposits

This Endorsement is made a part of the group or individual annuity contract or group annuity certificate to which it is attached (the "Contract"). This Endorsement supersedes any inconsistent provisions of the Contract or any endorsement issued concurrent with this Endorsement. Capitalized terms are defined below or have the same meaning given to them in the Contract. This Endorsement amends the Contract as follows:

The Company will add a Premium Enhancement Credit to your Accumulation Value on the day we receive the initial Purchase Payment deposit or a series of deposits (hereinafter defined as "Eligible Deposit") within the first 90-days from the date of the initial Purchase Payment deposit, meeting the Minimum Deposit Requirement, subject to the Eligibility Period and the following conditions:

- The Premium Enhancement Credit is the amount the Company will add to your Contract. It equals [two percent (2%)] of the Eligible Deposit.
- An Eligible Deposit is the initial Purchase Payment deposit or a series of deposits made over the first 90-days from the date of the initial Purchase Payment deposit that is transferred from a non-Company contract or account. An Eligible Deposit does not include an employer or employee contribution made to the Contract, whether made as an elective or nonelective employee contribution under the plan or program under which this Contract is issued.
- An Eligible Deposit must be in an amount of [\$50,000] or greater (the "Minimum Deposit Requirement") in order to receive the Premium Enhancement Credit. We will aggregate multiple qualifying deposits made within the first 90-days from the date of the initial Purchase Payment deposit to meet the Minimum Deposit Requirement for an Eligible Deposit. No deposit shall be counted unless it has been made on or within the first 90-days of the initial Purchase Payment deposit. No Premium Enhancement Credits will be applied to Eligible Deposits received after a withdrawal is made from the Contract.
- The Eligibility Period is the period of time during which we must receive an Eligible Deposit (or the first Eligible Deposit of multiple Eligible Deposits aggregated within the first 90-days of the initial Purchase Payment deposit to meet the Minimum Deposit Requirement). It runs from [April 5, 2010] through [December 31, 2010].
- We will allocate the Premium Enhancement Credit among the Fixed and Variable Investment Options in the same manner as the corresponding Eligible Deposit. If multiple Eligible Deposits are aggregated within the first 90-days from the date of the initial Purchase Payment deposit to meet the Minimum Deposit Requirement, we will credit and allocate the Premium Enhancement Credit on the effective date of, and consistent with the allocation of, the last Eligible Deposit so aggregated.
- The Premium Enhancement Credit and any gains or losses attributable to such amounts will be treated as earnings for all purposes under the Contract. The Premium Enhancement Credit will therefore be immediately available for withdrawal, annuitization or payment of a death benefit. The Company reserves the right not to credit any Premium Enhancement Credit until the end of the Contract's Free Look Period.
- The Premium Enhancement Credit will not apply in the event the Contract is maintained under a plan subject to Title I of ERISA.
- Except as otherwise provided in this Endorsement, the Premium Enhancement Credit will be subject to all of the rights and limitations that would otherwise apply under the Contract to earnings, gains, or other credits under the Contract.

All other terms and conditions of the Contract (as modified by any other endorsement issued therewith) remain unchanged. The effective date of this Endorsement is the Contract effective date.

THE VARIABLE ANNUITY LIFE INSURANCE COMPANY

[*Katherine Stoner*]

SECRETARY

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Supporting Document Schedules

	Item Status:	Status Date:
Satisfied - Item: Flesch Certification Comments: Attachment: flesch.pdf		
Bypassed - Item: Application Bypass Reason: n/a Comments:		
Bypassed - Item: Life & Annuity - Acturial Memo Bypass Reason: n/a Comments:		
Satisfied - Item: statement of variability Comments: Attachment: SOV.pdf		

CERTIFICATION

THE VARIABLE ANNUITY LIFE INSURANCE COMPANY, NAIC #70238, hereby certifies that the following form(s) comply with the Flesch scale of readability requirements of Ark. Stat. Ann. s 23-80-206 and s 23-80-207 as cited in the Life and Disability Insurance Policy Language Simplification Act.

<u>Form Number</u>	<u>Form Description</u>	<u>Flesh Score</u>
PDPB-110	Premium Enhancement Credit Endorsement on Eligible Deposits	50.5



Tracey Harris
Vice President

January 19, 2010
Date

The Variable Annuity Life Insurance Company
Statement of Variability (“SOV”)
Bracketed Material for Endorsement Form PDPB-110

1. The Premium Enhancement Credit is the amount the Company will add to your Contract. This percentage will range between 1% and 4% of the Eligible Deposit.
2. An Eligible Deposit will range from \$10,000 to \$100,000.
3. The Eligibility Period is intended to run coincident with each school year and will be declared in advance of each upcoming year.
4. The officer signature is bracketed to allow for administrative flexibility.



Tracey Harris
Vice President

January 19, 2010
Date