

SERFF Tracking Number: INGD-126786180 State: Arkansas
Filing Company: ING USA Annuity and Life Insurance Company State Tracking Number: 47079
Company Tracking Number: IU-IA-3050(01/11) ET AL
TOI: A071 Individual Annuities - Special Sub-TOI: A071.001 Equity Indexed
Product Name: IU-IA-3050(01/11) and IU-IA-3064(01/11) et al, Contract Data Pgs & Payment Plans Endorsement
Project Name/Number: Contract Data Pgs & Payment Plans Endorsement/IU-IA-3050(01/11) and IU-IA-3064(01/11) et al

Filing at a Glance

Company: ING USA Annuity and Life Insurance Company

Product Name: IU-IA-3050(01/11) and IU-IA-3064(01/11) et al, Contract Data Pgs & Payment Plans Endorsement

TOI: A071 Individual Annuities - Special

SERFF Status: Closed-Approved-Closed
State Tr Num: 47079

Sub-TOI: A071.001 Equity Indexed

Co Tr Num: IU-IA-3050(01/11) ET AL
State Status: Approved-Closed

Filing Type: Form

Reviewer(s): Linda Bird

Authors: Karen Flieck, Alicia Gemelli, Susan Holloway, Christine Runkle-DiFonzo

Disposition Date: 10/21/2010

Date Submitted: 10/18/2010

Disposition Status: Approved-Closed

Implementation Date Requested: On Approval

Implementation Date:

State Filing Description:

General Information

Project Name: Contract Data Pgs & Payment Plans Endorsement
Project Number: IU-IA-3050(01/11) and IU-IA-3064(01/11) et al
Requested Filing Mode: Review & Approval

Status of Filing in Domicile: Authorized
Date Approved in Domicile: 09/28/2010
Domicile Status Comments: Iowa is our state of domicile.

Explanation for Combination/Other:
Submission Type: New Submission
Overall Rate Impact:
Filing Status Changed: 10/21/2010

Market Type: Individual
Group Market Size:
Group Market Type:
Explanation for Other Group Market Type:
State Status Changed: 10/21/2010

Deemer Date:
Submitted By: Christine Runkle-DiFonzo
Filing Description:

Created By: Christine Runkle-DiFonzo
Corresponding Filing Tracking Number:

RE: ING USA Annuity and Life Insurance Company

NAIC No.: 229-80942 FEIN No.: 41-0991508

Contract Data Pages 3 and 4, Form No. IU-IA-3050(01/11)

SERFF Tracking Number: INGD-126786180 State: Arkansas
Filing Company: ING USA Annuity and Life Insurance Company State Tracking Number: 47079
Company Tracking Number: IU-IA-3050(01/11) ET AL
TOI: A071 Individual Annuities - Special Sub-TOI: A071.001 Equity Indexed
Product Name: IU-IA-3050(01/11) and IU-IA-3064(01/11) et al, Contract Data Pgs & Payment Plans Endorsement
Project Name/Number: Contract Data Pgs & Payment Plans Endorsement/IU-IA-3050(01/11) and IU-IA-3064(01/11) et al

Contract Data Pages 3 and 4, Form No. IU-IA-3064(01/11), IU-IA-3065(01/11), IU-IA-3066(01/11) and IU-IA-3067(01/11)

Payment Plans Endorsement IU-RA-3097

Enclosed please find the above-referenced forms for your review and approval. The revised contract data pages 3 and 4 above are intended to replace contract data pages 3 and 4 of their associated contract. The Payment Plans Endorsement is new and is not intended to revise or replace any forms previously filed with, or approved for use by, your Department. The revised contract data pages and Payment Plans Endorsement will be attached to all new issues of the previously approved contract as described below. The forms do not contain any unusual or possibly controversial items from normal company or industry standards.

Contract Data Pages 3 and 4, Form No. IU-IA-3050(01/11):

The revised contract data pages 3 and 4 are intended to replace contract data pages 3 and 4 of individual Single Premium Deferred Annuity Contract, form no. IU-IA-3050(AR), approved by your Department on 2/6/07 under SERFF Tracking No. WEST-125041113, State Tracking No. 34907. The submitted contract data pages change the Minimum Guaranteed Interest Rate applicable to the Fixed Rate Strategy from 1.50% to 1.00% and the definition of the Minimum Guaranteed Contract Value. The Minimum Guaranteed Contract Value is the minimum value required by the Standard Nonforfeiture Law.

Contract Data Pages 3 and 4, form no. IU-IA-3064(01/11), IU-IA-3065(01/11), IU-IA-3066(01/11) and IU-IA-3067(01/11):

The revised contract data pages 3 and 4 for each contract above are intended to replace contract data pages 3 and 4 of individual Flexible Premium Deferred Annuity Contracts, form no. IU-IA-3064, IU-IA-3065, IU-IA-3066 and IU-IA-3067 approved by your Department on 11/5/07 under SERFF Tracking No. WEST-125265122, State Tracking No. 37088. The submitted contract data pages change the Minimum Guaranteed Interest Rate applicable to the Fixed Rate Strategy from 1.50% to 1.00% and the definition of the Minimum Guaranteed Contract Value. The Minimum Guaranteed Contract Value is the minimum value required by the Standard Nonforfeiture Law.

Payment Plans Endorsement IU-RA-3097:

Form IU-RA-3097 will be attached to previously approved individual Single Premium Deferred Annuity Contract, form no. IU-IA-3050(AR) and individual Flexible Premium Deferred Annuity Contracts, form no. IU-IA-3064, IU-IA-3065, IU-IA-3066 and IU-IA-3067, as mentioned above. Minimum payments for annuitization will be based on an interest rate of 1% rather than 1.5%. The tables within the Payment Plans Endorsement also reflect this change. For qualified plans such as 401(k) and SEP IRAs, page 2-NU with sex distinct values for nonqualified plans will be replaced with page 2-U with unisex values.

General Information

Actuarial materials – Enclosed are the actuarial addendums to the Statement of Actuarial Basis and accompanying

SERFF Tracking Number: INGD-126786180 State: Arkansas
Filing Company: ING USA Annuity and Life Insurance Company State Tracking Number: 47079
Company Tracking Number: IU-IA-3050(01/11) ET AL
TOI: A071 Individual Annuities - Special Sub-TOI: A071.001 Equity Indexed
Product Name: IU-IA-3050(01/11) and IU-IA-3064(01/11) et al, Contract Data Pgs & Payment Plans Endorsement
Project Name/Number: Contract Data Pgs & Payment Plans Endorsement/IU-IA-3050(01/11) and IU-IA-3064(01/11) et al
nonforfeiture demonstrations for the submitted forms.

Statement of Variability – Information considered variable in the revised contract data pages submitted is enclosed in brackets and is described in the Statement of Variability for each document. We may change such variable material for new issues on a uniform and non-discriminatory basis only as described in the Statement of Variability without refiling.

Please note that changes in printing technology may alter slightly the format of the forms. We reserve the right to make such changes without refiling as well as to modify the officer's signature to reflect current company operations. Any such revisions will comply with applicable state requirements.

Readability – Enclosed is the readability certification for the Payment Plans Endorsement.

Domicile – The forms were filed in Iowa, our state of domicile, and approved for use on 9/28/10.

Thank you for your assistance with this filing. Your review and approval of this submission will be greatly appreciated. If you should have any questions or require additional information, please do not hesitate to contact me.

Sincerely,

Christine P. Runkle-DiFonzo, AIRC
Contract Filing
(800) 325-3972 ext. 4253977
610-425-3977
christine.runkle-difonzo@us.ing.com

Company and Contact

Filing Contact Information

Christine DiFonzo, Contract Analyst christine.runkle-difonzo@us.ing.com
1475 Dunwoody Drive 800-325-3792 [Phone] 4253977
[Ext]
West Chester, PA 19380 610-426-3520 [FAX]

Filing Company Information

ING USA Annuity and Life Insurance Company CoCode: 80942 State of Domicile: Iowa
1475 Dunwoody Drive Group Code: 229 Company Type:
West Chester, PA 19380 Group Name: State ID Number:
(800) 325-3792 ext. [Phone] FEIN Number: 41-0991508

SERFF Tracking Number: *INGD-126786180* State: *Arkansas*
Filing Company: *ING USA Annuity and Life Insurance Company* State Tracking Number: *47079*
Company Tracking Number: *IU-IA-3050(01/11) ET AL*
TOI: *A071 Individual Annuities - Special* Sub-TOI: *A071.001 Equity Indexed*
Product Name: *IU-IA-3050(01/11) and IU-IA-3064(01/11) et al, Contract Data Pgs & Payment Plans Endorsement*
Project Name/Number: *Contract Data Pgs & Payment Plans Endorsement/IU-IA-3050(01/11) and IU-IA-3064(01/11) et al*

Filing Fees

Fee Required? Yes
Fee Amount: \$300.00
Retaliatory? No
Fee Explanation: 6 attachments @ \$50.00 each/contract data pages and payment plans endorsement
Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
ING USA Annuity and Life Insurance Company	\$300.00	10/18/2010	40864348

SERFF Tracking Number: *INGD-126786180* State: *Arkansas*
Filing Company: *ING USA Annuity and Life Insurance Company* State Tracking Number: *47079*
Company Tracking Number: *IU-IA-3050(01/11) ET AL*
TOI: *A071 Individual Annuities - Special* Sub-TOI: *A071.001 Equity Indexed*
Product Name: *IU-IA-3050(01/11) and IU-IA-3064(01/11) et al, Contract Data Pgs & Payment Plans Endorsement*
Project Name/Number: *Contract Data Pgs & Payment Plans Endorsement/IU-IA-3050(01/11) and IU-IA-3064(01/11) et al*

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved-Closed	Linda Bird	10/21/2010	10/21/2010

SERFF Tracking Number: *INGD-126786180* State: *Arkansas*
 Filing Company: *ING USA Annuity and Life Insurance Company* State Tracking Number: *47079*
 Company Tracking Number: *IU-IA-3050(01/11) ET AL*
 TOI: *A071 Individual Annuities - Special* Sub-TOI: *A071.001 Equity Indexed*
 Product Name: *IU-IA-3050(01/11) and IU-IA-3064(01/11) et al, Contract Data Pgs & Payment Plans Endorsement*
 Project Name/Number: *Contract Data Pgs & Payment Plans Endorsement/IU-IA-3050(01/11) and IU-IA-3064(01/11) et al*

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	Statement of Variability		Yes
Form	Contract Data Page		Yes
Form	Contract Data Page		Yes
Form	Contract Data Page		Yes
Form	Contract Data Page		Yes
Form	Contract Data Page		Yes
Form	Payment Plans Endorsement		Yes

SERFF Tracking Number: INGD-126786180 State: Arkansas
 Filing Company: ING USA Annuity and Life Insurance Company State Tracking Number: 47079
 Company Tracking Number: IU-IA-3050(01/11) ET AL
 TOI: A071 Individual Annuities - Special Sub-TOI: A071.001 Equity Indexed
 Product Name: IU-IA-3050(01/11) and IU-IA-3064(01/11) et al, Contract Data Pgs & Payment Plans Endorsement
 Project Name/Number: Contract Data Pgs & Payment Plans Endorsement/IU-IA-3050(01/11) and IU-IA-3064(01/11) et al

Form Schedule

Lead Form Number: IU-IA-3050(01/11) et al

Schedule Item Status	Form Number	Form Type	Form Name	Action	Action Specific Data	Readability	Attachment
	IU-IA-3050(01/11))	Schedule	Contract Data Page	Initial		0.000	IU-IA-3050(0111) Contract Data pages.pdf
	IU-IA-3064(01/11))	Schedule	Contract Data Page	Initial		0.000	IU-IA-3064(0111) Contract Data Pages - No Window.pdf
	IU-IA-3065(01/11))	Schedule	Contract Data Page	Initial		0.000	IU-IA-3065(0111) Contract Data Pages - 3 & 6 Yr Window.pdf
	IU-IA-3066(01/11))	Schedule	Contract Data Page	Initial		0.000	IU-IA-3066(0111) Contract Data Pages - 4 & 8 Yr. Window.pdf
	IU-IA-3067(01/11))	Schedule	Contract Data Page	Initial		0.000	IU-IA-3067(0111) Contract Data Pages - 6 Yr. Window.pdf
	IU-RA-3097	Policy/Cont ract/Fraternal Certificate: Amendmen	Payment Plans Endorsement	Initial		67.200	IU-RA-3097.pdf

SERFF Tracking Number: *INGD-126786180* State: *Arkansas*
Filing Company: *ING USA Annuity and Life Insurance Company* State Tracking Number: *47079*
Company Tracking Number: *IU-IA-3050(01/11) ET AL*
TOI: *A071 Individual Annuities - Special* Sub-TOI: *A071.001 Equity Indexed*
Product Name: *IU-IA-3050(01/11) and IU-IA-3064(01/11) et al, Contract Data Pgs & Payment Plans Endorsement*
Project Name/Number: *Contract Data Pgs & Payment Plans Endorsement/IU-IA-3050(01/11) and IU-IA-3064(01/11) et al*
t, Insert
Page,
Endorseme
nt or Rider

CONTRACT DATA PAGE

ANNUITANT: [John Doe]
SEX: [Male]
AGE: [35]
OWNER: [John Doe]
CONTRACT NUMBER: [TST763447]
CONTRACT DATE: [07/01/2010]
MATURITY DATE: [07/01/2070]
SINGLE PREMIUM PAID: [\$10,000.00]
STATE PREMIUM TAX PAID: [\$0.00]
SINGLE PREMIUM LESS PREMIUM TAX: [\$10,000.00]
BONUS: [5%] of Single Premium

INITIAL CREDITING STRATEGY ELECTION

This table reflects the initial election of the Strategies for your Single Premium. The initial rates, caps, and spread shown are guaranteed for the first Contract Year and may change thereafter as described in the Strategies section of this Contract. The rates in the table are used to determine the Accumulation Value of each Strategy. They are not used to determine the Minimum Guaranteed Contract Value or the Minimum Guaranteed Strategy Values.

	Fixed Rate Strategy	Point-to-Point Participation Index Strategy	Point-to-Point Cap Index Strategy	Monthly Average Index Strategy	Monthly Cap Index Strategy
Percentage of Single Premium	[20%]	[20%]	[20%]	[20%]	[20%]
Amount of Single Premium	[\$2,000]	[\$2,000]	[\$2,000]	[\$2,000]	[\$2,000]
Minimum Guaranteed Interest Rate	1.0%				
Initial Interest Rate	[3.0%]				
Initial Participation Rate		[60%]		[100%]	
Initial Index Cap			[7.0%]		
Initial Index Spread				[2.0%]	
Initial Monthly Cap					[3.0%]

CONTRACT DATA PAGE (cont.)

MINIMUM GUARANTEED CONTRACT VALUE

	Fixed Rate Strategy	Index Strategies
Initial Minimum Guaranteed Strategy Value Rate:	[3.00%]	[3.00%]

The **Minimum Guaranteed Contract Value** equals the sum of the Minimum Guaranteed Strategy Value of each Strategy.

The **Minimum Guaranteed Strategy Value** of each Strategy equals:

- (a) 87.5% of the portion of the Single Premium elected to the Strategy, less Premium Taxes, if applicable; adjusted for
- (b) Any Re-elections or Surrenders of Accumulation Value; plus
- (c) Interest credited daily at the applicable Minimum Guaranteed Strategy Value Rate.

The initial Minimum Guaranteed Strategy Value Rates shown above are set on the Contract Date and will not change for the first ten Contract Years. On the tenth Contract Anniversary and on each Contract Anniversary thereafter, the **Minimum Guaranteed Strategy Value Rates** for all Strategies will be set equal to the average of the five-year Constant Maturity Treasury Rate for each day that it is reported by the Federal Reserve during the month of October in the calendar year preceding the calendar year of the Contract Anniversary, less 1.25%. The Minimum Guaranteed Strategy Value Rate for both the Fixed Rate Strategy and the Index Strategies will be rounded to the nearest 0.05% and will not be greater than 3.0% or less than 1.0%.

Re-elections and Surrender Adjustments

A Re-election of Accumulation Value will result in a pro-rata Re-election of the Minimum Guaranteed Strategy Value in the same proportion as the Accumulation Value being re-elected bears to the total Accumulation Value in the Strategy from which the Re-election is made.

Surrender of Accumulation Value from any Strategy will result in a dollar for dollar reduction of the Minimum Guaranteed Strategy Value of that Strategy equal to the amount of Accumulation Value Surrendered (excluding the amount of any Market Value Adjustment and Surrender Charge and Bonus Recapture deducted, if any).

TABLE OF SURRENDER CHARGES

Contract Year	1	2	3	4	5	6	7	8	9	10	11 and later
Percentage	10%	10%	10%	10%	9%	8%	7%	6%	5%	4%	0%

TABLE OF BONUS RECAPTURE PERCENTAGES

Contract Year	1	2	3	4	5	6	7	8	9	10	11 and later
Percentage	[100%]	[100%]	[80%]	[80%]	[60%]	[60%]	[40%]	[40%]	[20%]	[20%]	0%

CONTRACT DATA PAGE

Annuitant [John Doe]	Sex [Male]	Age [35]
Owner [John Doe]		
Contract Number [TST763593]	Contract Date [09/01/2010]	Maturity Date [09/01/2070]
Initial Premium Paid [\$15,000]	State Premium Tax Paid [\$0.00]	
Initial Premium Less Premium Tax [\$15,000]		
Index One [S&P 500*]	Index One Weight [70%]	
Index Two [Insert Secondary Index Name**]	Index Two Weight [30%]	

FIXED RATE STRATEGY

Initial Minimum Guaranteed Strategy Value Rate	[3.00%]
Amount of Initial Premium	[\$3,000]
Premium Election Percentage	[20%]
Initial Interest Rate	[3.00%]
Minimum Guaranteed Interest Rate	1.0%

Riders and Endorsements attached:

INDEX STRATEGY(IES)

Initial Minimum Guaranteed Strategy Value Rate	[3.00%]
--	---------

[POINT-TO-POINT PARTICIPATION INDEX STRATEGY RIDER, IU-RA-3068

Amount of Initial Premium	[\$3,000]
Premium Election Percentage	[20%]
Initial Participation Rate	[50.00%]

The Participation Rate will never be less than 10% and will never exceed 150%.]

[POINT-TO-POINT CAP INDEX STRATEGY RIDER, IU-RA-3069

Amount of Initial Premium	[\$3,000]
Premium Election Percentage	[20%]
Initial Index Cap	[6.00%]

The Index Cap will never be less than 2% and will never exceed 100%.]

[MONTHLY AVERAGE INDEX SPREAD STRATEGY RIDER, IU-RA-3070

Amount of Initial Premium	[\$3,000]
Premium Election Percentage	[20%]
Initial Index Spread	[2.00%]

The Index Spread will never be less than 0% and will never exceed 25%.]

[MONTHLY CAP INDEX STRATEGY RIDER, IU-RA-3071

Amount of Initial Premium	[\$3,000]
Premium Election Percentage	[20%]
Initial Monthly Cap	[2.50%]

The Monthly Cap will never be less than 0.5% and will never exceed 25%.]

[*Standard & Poor's, "S&P 500," "Standard & Poor's 500," and "500" are trademarks of The McGraw-Hill Companies, Inc. and have been licensed for use by ING USA Annuity and Life Insurance Company. The product is not sponsored, endorsed, sold or promoted by Standard & Poor's and Standard & Poor's makes no representation regarding the advisability of purchasing the product.]

[**Insert Index Two trademark language]

(This page intentionally left blank.)

CONTRACT DATA PAGE (cont.)

The **Minimum Guaranteed Contract Value** equals the sum of the Minimum Guaranteed Strategy Value of each Strategy.

The **Minimum Guaranteed Strategy Value** of each Strategy equals:

- (a) 87.5% of the portion of the Premium elected to the Strategy, less Premium Taxes, if applicable; plus
- (b) Any re-elections into the Strategy; less
- (c) Any Re-elections and Surrenders taken from Accumulation Value in that Strategy; plus
- (d) Interest credited daily at the applicable Minimum Guaranteed Strategy Value Rate.

The initial Minimum Guaranteed Strategy Value Rates shown above are set on the Contract Date and will not change for the first nine Contract Years. On the ninth Contract Anniversary and on each Contract Anniversary thereafter, the **Minimum Guaranteed Strategy Value Rates** for all Strategies will be set equal to the average of the five-year Constant Maturity Treasury Rate for each day that it is reported by the Federal Reserve during the month of October in the calendar year preceding the calendar year of the Contract Anniversary, less 1.25%. The Minimum Guaranteed Strategy Value Rate for both the Fixed Rate Strategy and the Index Strategies will be rounded to the nearest 0.05% and will not be greater than 3.0% or less than 1.0%.

Re-elections and Surrender Adjustments

A Re-election of Accumulation Value will result in a pro-rata Re-election of the Minimum Guaranteed Strategy Value in the same proportion as the Accumulation Value being re-elected bears to the total Accumulation Value in the Strategy from which the Re-election is made.

Surrender of Accumulation Value from any Strategy will result in a dollar for dollar reduction of the Minimum Guaranteed Strategy Value of that Strategy equal to the amount of Accumulation Value Surrendered (excluding the amount of any Market Value Adjustment and Surrender Charges deducted, if any).

Any reference to **Minimum Guaranteed Contract Value Surrender Charge** does not apply to this Contract.

TABLE OF SURRENDER CHARGES

Contract Year	1	2	3	4	5	6	7	8	9	10 & later
Percentage	9%	9%	9%	9%	8%	7%	6%	5%	4%	0%

CONTRACT DATA PAGE

Annuitant [John Doe]	Sex [Male]	Age [35]
Owner [John Doe]		
Contract Number [TST763594]	Contract Date [09/01/2010]	Maturity Date [09/01/2070]
Initial Premium Paid [\$15,000]	State Premium Tax Paid [\$0.00]	
Initial Premium Less Premium Tax [\$15,000]		
Index One [S&P 500 Index*]	Index One Weight [70%]	
Index Two [Insert Secondary Index Two Name**]	Index Two Weight [30%]	

FIXED RATE STRATEGY

Initial Minimum Guaranteed Strategy Value Rate	[3.00%]
Amount of Initial Premium	[\$3,000]
Premium Election Percentage	[20%]
Initial Interest Rate	[3.00%]
Minimum Guaranteed Interest Rate	1.0%

Riders and Endorsements attached:

INDEX STRATEGY(IES)

Initial Minimum Guaranteed Strategy Value Rate	[3.00%]
--	---------

[POINT-TO-POINT PARTICIPATION INDEX STRATEGY RIDER, IU-RA-3068

Amount of Initial Premium	[\$3,000]
Premium Election Percentage	[20%]
Initial Participation Rate	[50.00%]

The Participation Rate will never be less than 10% and will never exceed 150%.]

[POINT-TO-POINT CAP INDEX STRATEGY RIDER, IU-RA-3069

Amount of Initial Premium	[\$3,000]
Premium Election Percentage	[20%]
Initial Index Cap	[6.00%]

The Index Cap will never be less than 2% and will never exceed 100%.]

[MONTHLY AVERAGE INDEX SPREAD STRATEGY RIDER, IU-RA-3070

Amount of Initial Premium	[\$3,000]
Premium Election Percentage	[20%]
Initial Index Spread	[2.00%]

The Index Spread will never be less than 0% and will never exceed 25%.]

[MONTHLY CAP INDEX STRATEGY RIDER, IU-RA-3071

Amount of Initial Premium	[\$3,000]
Premium Election Percentage	[20%]
Initial Monthly Cap	[2.50%]

The Monthly Cap will never be less than 0.5% and will never exceed 25%.]

[*“Standard & Poor’s,” “S&P 500,” “Standard & Poor’s 500,” and “500” are trademarks of The McGraw-Hill Companies, Inc. and have been licensed for use by ING USA Annuity and Life Insurance Company. The product is not sponsored, endorsed, sold or promoted by Standard & Poor’s and Standard & Poor’s makes no representation regarding the advisability of purchasing the product.]

[**Insert Index Two trademark language]

(This page intentionally left blank.)

CONTRACT DATA PAGE (cont.)

The **Minimum Guaranteed Contract Value** equals the sum of the Minimum Guaranteed Strategy Value of each Strategy.

The **Minimum Guaranteed Strategy Value** of each Strategy equals:

- (a) 87.5% of the portion of the Premium elected to the Strategy, less Premium Taxes, if applicable; plus
- (b) Any re-elections into the Strategy; less
- (c) Any Re-elections and Surrenders taken from Accumulation Value in that Strategy; plus
- (d) Interest credited daily at the applicable Minimum Guaranteed Strategy Value Rate.

The initial Minimum Guaranteed Strategy Value Rates shown above are set on the Contract Date and will not change for the first nine Contract Years. On the ninth Contract Anniversary and on each Contract Anniversary thereafter, the **Minimum Guaranteed Strategy Value Rates** for all Strategies will be set equal to the average of the five-year Constant Maturity Treasury Rate for each day that it is reported by the Federal Reserve during the month of October in the calendar year preceding the calendar year of the Contract Anniversary, less 1.25%. The Minimum Guaranteed Strategy Value Rate for both the Fixed Rate Strategy and the Index Strategies will be rounded to the nearest 0.05% and will not be greater than 3.0% or less than 1.0%.

Re-elections and Surrender Adjustments

A Re-election of Accumulation Value will result in a pro-rata Re-election of the Minimum Guaranteed Strategy Value in the same proportion as the Accumulation Value being re-elected bears to the total Accumulation Value in the Strategy from which the Re-election is made.

Surrender of Accumulation Value from any Strategy will result in a dollar for dollar reduction of the Minimum Guaranteed Strategy Value of that Strategy equal to the amount of Accumulation Value Surrendered (excluding the amount of any Market Value Adjustment and Surrender Charges deducted, if any).

Any reference to **Minimum Guaranteed Contract Value Surrender Charge** does not apply to this Contract.

TABLE OF SURRENDER CHARGES

Contract Year	1	2	3	4	5	6	7	8	9	10 & later
Percentage	9%	9%	9%	9%	8%	7%	6%	5%	4%	0%

CONTRACT DATA PAGE

Annuitant [John Doe]	Sex [Male]	Age [35]
Owner [John Doe]		
Contract Number [TST763595]	Contract Date [09/01/2010]	Maturity Date [09/01/2070]
Initial Premium Paid [\$15,000]	State Premium Tax Paid [\$0.00]	
Initial Premium Less Premium Tax [\$15,000]		
Index One [S&P 500 Index*]	Index One Weight [70%]	
Index Two [Insert Secondary Index Name**]	Index Two Weight [30%]	

FIXED RATE STRATEGY

Initial Minimum Guaranteed Strategy Value Rate	[3.00%]
Amount of Initial Premium	[\$3,000]
Premium Election Percentage	[20%]
Initial Interest Rate	[3.00%]
Minimum Guaranteed Interest Rate	1.0%

Riders and Endorsements attached:

INDEX STRATEGY(IES)

Initial Minimum Guaranteed Strategy Value Rate	[3.00%]
--	---------

[POINT-TO-POINT PARTICIPATION INDEX STRATEGY RIDER, IU-RA-3068

Amount of Initial Premium	[\$3,000]
Premium Election Percentage	[20%]
Initial Participation Rate	[50.00%]

The Participation Rate will never be less than 10% and will never exceed 150%.]

[POINT-TO-POINT CAP INDEX STRATEGY RIDER, IU-RA-3069

Amount of Initial Premium	[\$3,000]
Premium Election Percentage	[20%]
Initial Index Cap	[6.00%]

The Index Cap will never be less than 2% and will never exceed 100%.]

[MONTHLY AVERAGE INDEX SPREAD STRATEGY RIDER, IU-RA-3070

Amount of Initial Premium	[\$3,000]
Premium Election Percentage	[20%]
Initial Index Spread	[2.00%]

The Index Spread will never be less than 0% and will never exceed 25%.]

[MONTHLY CAP INDEX STRATEGY RIDER, IU-RA-3071

Amount of Initial Premium	[\$3,000]
Premium Election Percentage	[20%]
Initial Monthly Cap	[2.50%]

The Monthly Cap will never be less than 0.5% and will never exceed 25%.]

[*Standard & Poor's, "S&P 500," "Standard & Poor's 500," and "500" are trademarks of The McGraw-Hill Companies, Inc. and have been licensed for use by ING USA Annuity and Life Insurance Company. The product is not sponsored, endorsed, sold or promoted by Standard & Poor's and Standard & Poor's makes no representation regarding the advisability of purchasing the product.]

[**Insert Index Two trademark language]

(This page intentionally left blank.)

CONTRACT DATA PAGE (cont.)

The **Minimum Guaranteed Contract Value** equals the sum of the Minimum Guaranteed Strategy Value of each Strategy.

The **Minimum Guaranteed Strategy Value** of each Strategy equals:

- (a) 87.5% of the portion of the Premium elected to the Strategy, less Premium Taxes, if applicable; plus
- (b) Any re-elections into the Strategy; less
- (c) Any Re-elections and Surrenders taken from Accumulation Value in that Strategy; plus
- (d) Interest credited daily at the applicable Minimum Guaranteed Strategy Value Rate.

The initial Minimum Guaranteed Strategy Value Rates shown above are set on the Contract Date and will not change for the first nine Contract Years. On the ninth Contract Anniversary and on each Contract Anniversary thereafter, the **Minimum Guaranteed Strategy Value Rates** for all Strategies will be set equal to the average of the five-year Constant Maturity Treasury Rate for each day that it is reported by the Federal Reserve during the month of October in the calendar year preceding the calendar year of the Contract Anniversary, less 1.25%. The Minimum Guaranteed Strategy Value Rate for both the Fixed Rate Strategy and the Index Strategies will be rounded to the nearest 0.05% and will not be greater than 3.0% or less than 1.0%.

Re-elections and Surrender Adjustments

A Re-election of Accumulation Value will result in a pro-rata Re-election of the Minimum Guaranteed Strategy Value in the same proportion as the Accumulation Value being re-elected bears to the total Accumulation Value in the Strategy from which the Re-election is made.

Surrender of Accumulation Value from any Strategy will result in a dollar for dollar reduction of the Minimum Guaranteed Strategy Value of that Strategy equal to the amount of Accumulation Value Surrendered (excluding the amount of any Market Value Adjustment and Surrender Charges deducted, if any).

Any reference to **Minimum Guaranteed Contract Value Surrender Charge** does not apply to this Contract.

TABLE OF SURRENDER CHARGES

Contract Year	1	2	3	4	5	6	7	8	9	10 & later
Percentage	9%	9%	9%	9%	8%	7%	6%	5%	4%	0%

CONTRACT DATA PAGE

Annuitant [John Doe]	Sex [Male]	Age [35]
Owner [John Doe]		
Contract Number [TST763596]	Contract Date [09/01/2010]	Maturity Date [09/01/2070]
Initial Premium Paid [\$15,000]	State Premium Tax Paid [\$0.00]	
Initial Premium Less Premium Tax [\$15,000]		
Index One [S&P 500 Index*]	Index One Weight [70%]	
Index Two [Insert Secondary Index Name**]	Index Two Weight [30%]	

FIXED RATE STRATEGY

Initial Minimum Guaranteed Strategy Value Rate	[3.00%]
Amount of Initial Premium	[\$3,000]
Premium Election Percentage	[20%]
Initial Interest Rate	[3.00%]
Minimum Guaranteed Interest Rate	1.0%

Riders and Endorsements attached:

INDEX STRATEGY(IES)

Initial Minimum Guaranteed Strategy Value Rate	[3.00%]
--	---------

[POINT-TO-POINT PARTICIPATION INDEX STRATEGY RIDER, IU-RA-3068

Amount of Initial Premium	[\$3,000]
Premium Election Percentage	[20%]
Initial Participation Rate	[50.00%]

The Participation Rate will never be less than 10% and will never exceed 150%.]

[POINT-TO-POINT CAP INDEX STRATEGY RIDER, IU-RA-3069

Amount of Initial Premium	[\$3,000]
Premium Election Percentage	[20%]
Initial Index Cap	[6.00%]

The Index Cap will never be less than 2% and will never exceed 100%.]

[MONTHLY AVERAGE INDEX SPREAD STRATEGY RIDER, IU-RA-3070

Amount of Initial Premium	[\$3,000]
Premium Election Percentage	[20%]
Initial Index Spread	[2.00%]

The Index Spread will never be less than 0% and will never exceed 25%.]

[MONTHLY CAP INDEX STRATEGY RIDER, IU-RA-3071

Amount of Initial Premium	[\$3,000]
Premium Election Percentage	[20%]
Initial Monthly Cap	[2.50%]

The Monthly Cap will never be less than 0.5% and will never exceed 25%.]

[*Standard & Poor's, "S&P 500," "Standard & Poor's 500," and "500" are trademarks of The McGraw-Hill Companies, Inc. and have been licensed for use by ING USA Annuity and Life Insurance Company. The product is not sponsored, endorsed, sold or promoted by Standard & Poor's and Standard & Poor's makes no representation regarding the advisability of purchasing the product.]

[**Insert Index Two trademark language]

(This page intentionally left blank.)

CONTRACT DATA PAGE (cont.)

The **Minimum Guaranteed Contract Value** equals the sum of the Minimum Guaranteed Strategy Value of each Strategy.

The **Minimum Guaranteed Strategy Value** of each Strategy equals:

- (a) 87.5% of the portion of the Premium elected to the Strategy, less Premium Taxes, if applicable; plus
- (b) Any re-elections into the Strategy; less
- (c) Any Re-elections and Surrenders taken from Accumulation Value in that Strategy; plus
- (d) Interest credited daily at the applicable Minimum Guaranteed Strategy Value Rate.

The initial Minimum Guaranteed Strategy Value Rates shown above are set on the Contract Date and will not change for the first nine Contract Years. On the ninth Contract Anniversary and on each Contract Anniversary thereafter, the **Minimum Guaranteed Strategy Value Rates** for all Strategies will be set equal to the average of the five-year Constant Maturity Treasury Rate for each day that it is reported by the Federal Reserve during the month of October in the calendar year preceding the calendar year of the Contract Anniversary, less 1.25%. The Minimum Guaranteed Strategy Value Rate for both the Fixed Rate Strategy and the Index Strategies will be rounded to the nearest 0.05% and will not be greater than 3.0% or less than 1.0%.

Re-elections and Surrender Adjustments

A Re-election of Accumulation Value will result in a pro-rata Re-election of the Minimum Guaranteed Strategy Value in the same proportion as the Accumulation Value being re-elected bears to the total Accumulation Value in the Strategy from which the Re-election is made.

Surrender of Accumulation Value from any Strategy will result in a dollar for dollar reduction of the Minimum Guaranteed Strategy Value of that Strategy equal to the amount of Accumulation Value Surrendered (excluding the amount of any Market Value Adjustment and Surrender Charges deducted, if any).

Any reference to **Minimum Guaranteed Contract Value Surrender Charge** does not apply to this Contract.

TABLE OF SURRENDER CHARGES

Contract Year	1	2	3	4	5	6	7	8	9	10 & later
Percentage	9%	9%	9%	9%	8%	7%	6%	5%	4%	0%

**ING USA
ANNUITY AND LIFE
INSURANCE COMPANY**

Payment Plans Endorsement

ING USA is a stock company domiciled in Iowa

The Contract to which this Payment Plans Endorsement (this "Endorsement") is attached is modified by the provisions of this Endorsement. The Endorsement's provisions shall control to the extent a conflict exists between this Endorsement and the Contract. This Endorsement is effective as of the Contract Date and remains in effect until the Contract is terminated.

The following provision replaces d) in the third paragraph of the **PAYMENT PLANS** provision found in Section 7 of the Contract.

- d) The minimum amounts payable for each of the Payment Plans described below are based on an interest rate of 1.0% annually. We may pay a higher interest rate at our discretion. Payments for Plan B are based on the Annuity 2000 Mortality Table. The minimum payments for Plans A and B assume annual payments with the first payment made one year after the Proceeds are applied to the Payment Plan.

The following table replaces the table found in the **Plan A. Fixed Period** provision found in Section 7.1 of the Contract.

Minimum Amount of Each Installment Per \$1,000 of Proceeds or Cash Surrender Value for Plan A

Years Payable	Annual Installment	Years Payable	Annual Installment	Years Payable	Annual Installment
10	105.58	17	64.26	24	47.07
11	96.45	18	60.96	25	45.41
12	88.85	19	58.05	26	43.87
13	82.41	20	55.42	27	42.45
14	76.90	21	53.03	28	41.12
15	72.12	22	50.86	29	39.90
16	67.94	23	48.89	30	38.75

[THIS PAGE INTENTIONALLY LEFT BLANK]

The following table replaces the table found in the **Plan B. Life Income** provision found in Section 7.2 of the Contract.

Minimum Amount of Each Installment Per \$1,000 of Proceeds or Cash Surrender Value for Plan B

Male Annual Installment Guaranteed Period				Female Annual Installment Guaranteed Period			
Age of Payee	Life	10 Yrs.	20 Yrs.	Age of Payee	Life	10 Yrs.	20 Yrs.
45	32.70	32.56	32.04	45	30.27	30.21	29.96
46	33.39	33.24	32.65	46	30.87	30.80	30.51
47	34.12	33.95	33.29	47	31.49	31.41	31.09
48	34.89	34.68	33.94	48	32.15	32.06	31.68
49	35.69	35.46	34.62	49	32.83	32.73	32.30
50	36.52	36.26	35.31	50	33.55	33.43	32.95
51	37.40	37.11	36.03	51	34.31	34.17	33.61
52	38.33	37.99	36.77	52	35.10	34.94	34.31
53	39.30	38.92	37.53	53	35.93	35.75	35.03
54	40.32	39.89	38.32	54	36.81	36.60	35.77
55	41.40	40.91	39.12	55	37.74	37.50	36.55
56	42.54	41.99	39.93	56	38.71	38.44	37.34
57	43.74	43.12	40.77	57	39.75	39.43	38.17
58	45.03	44.31	41.61	58	40.84	40.48	39.02
59	46.39	45.56	42.47	59	42.00	41.58	39.89
60	47.84	46.88	43.33	60	43.23	42.74	40.78
61	49.38	48.27	44.20	61	44.53	43.96	41.70
62	51.03	49.73	45.07	62	45.92	45.25	42.62
63	52.79	51.26	45.92	63	47.40	46.62	43.56
64	54.68	52.87	46.77	64	48.97	48.06	44.50
65	56.69	54.55	47.59	65	50.66	49.58	45.45
66	58.84	56.31	48.39	66	52.46	51.19	46.38
67	61.14	58.14	49.16	67	54.39	52.89	47.30
68	63.59	60.03	49.89	68	56.46	54.68	48.19
69	66.22	62.00	50.57	69	58.69	56.57	49.04
70	69.02	64.03	51.21	70	61.10	58.55	49.86
71	72.01	66.12	51.81	71	63.70	60.64	50.62
72	75.21	68.25	52.35	72	66.52	62.82	51.33
73	78.64	70.43	52.83	73	69.57	65.09	51.97
74	82.31	72.65	53.27	74	72.87	67.44	52.55
75	86.26	74.89	53.65	75	76.46	69.87	53.06
76	90.50	77.13	53.98	76	80.34	72.36	53.50
77	95.05	79.37	54.27	77	84.57	74.88	53.88
78	99.96	81.59	54.51	78	89.16	77.43	54.21
79	105.23	83.77	54.72	79	94.16	79.97	54.48
80	110.91	85.89	54.88	80	99.61	82.47	54.70

Factors for ages not shown will be supplied upon request.

All other provisions of the Contract remain unchanged.

Signed:

[]
Secretary

The following table replaces the table found in the **Plan B. Life Income** provision found in Section 7.2 of the Contract.

Minimum Amount of Each Installment Per \$1,000 of Proceeds or Cash Surrender Value for Plan B

Age of Payee	Annual Installment Guaranteed Period		
	Life	10 Yrs.	20 Yrs.
45	30.27	30.21	29.96
46	30.87	30.80	30.51
47	31.49	31.41	31.09
48	32.15	32.06	31.68
49	32.83	32.73	32.30
50	33.55	33.43	32.95
51	34.31	34.17	33.61
52	35.10	34.94	34.31
53	35.93	35.75	35.03
54	36.81	36.60	35.77
55	37.74	37.50	36.55
56	38.71	38.44	37.34
57	39.75	39.43	38.17
58	40.84	40.48	39.02
59	42.00	41.58	39.89
60	43.23	42.74	40.78
61	44.53	43.96	41.70
62	45.92	45.25	42.62
63	47.40	46.62	43.56
64	48.97	48.06	44.50
65	50.66	49.58	45.45
66	52.46	51.19	46.38
67	54.39	52.89	47.30
68	56.46	54.68	48.19
69	58.69	56.57	49.04
70	61.10	58.55	49.86
71	63.70	60.64	50.62
72	66.52	62.82	51.33
73	69.57	65.09	51.97
74	72.87	67.44	52.55
75	76.46	69.87	53.06
76	80.34	72.36	53.50
77	84.57	74.88	53.88
78	89.16	77.43	54.21
79	94.16	79.97	54.48
80	99.61	82.47	54.70

Factors for ages not shown will be supplied upon request.

The Contract to which this Endorsement is attached is amended by deleting all references to "sex."

All other provisions of the Contract remain unchanged.

Signed:

[]
Secretary

SERFF Tracking Number: INGD-126786180 State: Arkansas
Filing Company: ING USA Annuity and Life Insurance Company State Tracking Number: 47079
Company Tracking Number: IU-IA-3050(01/11) ET AL
TOI: A071 Individual Annuities - Special Sub-TOI: A071.001 Equity Indexed
Product Name: IU-IA-3050(01/11) and IU-IA-3064(01/11) et al, Contract Data Pgs & Payment Plans Endorsement
Project Name/Number: Contract Data Pgs & Payment Plans Endorsement/IU-IA-3050(01/11) and IU-IA-3064(01/11) et al

Supporting Document Schedules

	Item Status:	Status Date:
Satisfied - Item: Flesch Certification		
Comments: See attached readability for Payment Plans Endorsement IU-RA-3097. Also attached is certification for Rule & Regulation 19.		
Attachments: IU-RA-3097 Readability Score.pdf AR Rule 19 Cert.pdf		

	Item Status:	Status Date:
Satisfied - Item: Statement of Variability		
Comments: See attached.		
Attachments: Opps Plus SOV - AR.pdf SOV IU-IA-3064 et al with 01-11 Changes - signed.pdf		

Readability Certificate

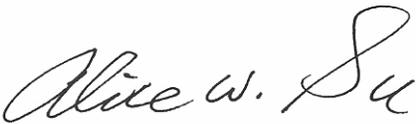
=====

I hereby certify that the forms referenced below have each been scored in their entirety using the Flesch Ease of Reading Test and have attained the score indicated. I further certify that, to the best of my knowledge and belief, said forms comply with state readability requirements and are printed in not less than ten point type, one point leaded.

The readability score was calculated by computer. The software used for this calculation was Microsoft Word.

<u>Form Number</u>	<u>Form Title</u>	<u>Flesch Score</u>	<u>Sentences</u>	<u>Words</u>
IU-RA-3097	Payment Plans Endorsement	67.2	16	205

ING Life Insurance and Annuity Company



Alice W. Su, FSA, MAAA
Vice President

**ARKANSAS
POLICY FORM CERTIFICATION**

Form Number: IU-IA-3050(01/11), IU-IA-3064(01/11), IU-IA-3065(01/11), IU-IA-3066(01/11)
IU-IA-3067(01/11) and IU-RA-3097

Form Title: Contract Data Page
 Payment Plans Endorsement

By my signature below, I hereby certify that I have reviewed the enclosed policy forms and certify that the forms submitted meet the provisions of Rule 19 as well as all applicable requirements of the Arkansas Insurance Department.

Signed:



Assistant Secretary

October 18, 2010

Date

ING USA Annuity and Life Insurance Company
Statement of Variability for
Single Premium Deferred Annuity Contract
Contract Data Page IU-IA-3050(01/11) - AR

Contract Data Page 3

Item	Variability
Annuitant	Information enclosed within these brackets will be varied to the extent necessary to reflect "issue specific" information.
Sex	
Age	
Owner	
Contract Number	
Contract Date	
Maturity Date	
Single Premium Paid	
State Premium Tax Paid	
Single Premium Less Premium Tax	Dollar amount showing Single Premium less any front-end premium tax paid.
Bonus	Set on the Contract Date and may vary for new issues. The Bonus will range from 0% to 6.0%.
Percentage of Single Premium	Percentage of premium paid that is elected to each strategy. The sum of percentages of premium elected to all strategies offered will equal 100%.
Amount of Single Premium	Premium dollar amount that is elected to each Strategy.
Initial Interest Rate	Applies to the Fixed Rate Strategy only. It is the initial interest rate credited to the associated portion of the Single Premium elected to the strategy. It is determined by us and guaranteed for the first 12 months. The Fixed Rate Strategy - Initial Interest Rate will never be less than the Fixed Rate Strategy - Minimum Guaranteed Interest Rate. The Fixed Rate Strategy - Initial Interest Rate is independent of the Fixed Rate Strategy - Minimum Guaranteed Strategy Value Rate.
Initial Participation Rate	Applies to the Point-to-Point Participation Index Strategy and the Monthly Average Index strategy, respectively. It is the initial percentage of the change in the Index that is used in calculating the Index Credit that will be applied to the associated portion of the Single Premium elected to each strategy. It is determined by us for each strategy and guaranteed for the first 12 months. The Initial Participation Rate will range from 10% to 150%.
Initial Index Cap	Applies to the Point-to-Point Cap Index Strategy only. It is the initial maximum amount of any Index Credit that can be applied to the associated portion of the Single Premium elected to the Strategy. It is determined by us and guaranteed for the first 12 months. The Initial Index Cap will range from 2% to 100%.

Initial Index Spread	Applies to the Monthly Average Index Strategy only. It is the amount subtracted from the result of the Index Change multiplied by the Participation Rate in calculating the Index Credit that will be applied to the associated portion of the Single Premium elected to the strategy. It is determined by us and guaranteed for the first 12 months. The Initial Index Spread will range from 0% to 25%.
Initial Monthly Cap	Applies to the Monthly Cap Index Strategy only. It is the initial maximum amount of any monthly change in the Index that can be used in calculating the Index Credit that will be applied to the associated portion of the Single Premium elected to the Strategy. It is determined by us and guaranteed for the first 12 months. The Initial Monthly Cap will range from 0.5% to 25%.

Contract Data Page 4

Fixed Rate Strategy - Initial Minimum Guaranteed Strategy Value Rate	Set on the Contract Date and will not change for the first ten contract years and will range from 2.0% to 3.0%. On the tenth contract anniversary and each contract anniversary thereafter, the Fixed Rate Strategy - Minimum Guaranteed Strategy Value Rate will be redetermined based on the five-year Constant Maturity Treasury as described on the Contract Data Page. The Fixed Rate Strategy - Minimum Guaranteed Strategy Value Rate is used only in the calculation of the Minimum Guaranteed Contract Value. The Fixed Rate Strategy - Minimum Guaranteed Strategy Value Rate is independent of the Fixed Rate Strategy - Minimum Guaranteed Interest Rate and the Fixed Rate Strategy - Initial Interest Rate.
Index Strategies - Initial Minimum Guaranteed Strategy Value Rate	Set on the Contract Date and will not change for the first ten contract years and will range from 2.0% to 3.0%. On the tenth contract anniversary and each contract anniversary thereafter, the Index Strategies - Minimum Guaranteed Strategy Value Rate will be redetermined based on the five-year Constant Maturity Treasury as described on the Contract Data Page. The Index Strategies - Minimum Guaranteed Strategy Value Rate is used only in the calculation of the Minimum Guaranteed Contract Value.
Table of Bonus Recapture Percentages	The Bonus Recapture Schedule as submitted represents the highest schedule we will ever offer but we may in the future offer a more client favorable bonus recapture schedule to new issues after the date of the change.



 Mary A. Borrelli, FSA, MAAA
 Actuary - Product Development
 ING USA Annuity and Life Insurance Company

10/10/10

 Date

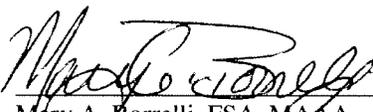
ING USA Annuity and Life Insurance Company
Statement of Variability for
Flexible Premium Deferred Annuity Contract
Contract Data Pages IU-IA-3064(01/11), IU-IA-3065(01/11), IU-IA-3066(01/11), IU-IA-
3067(01/11)

Contract Data Page 3

Item	Variability
Annuitant	Information enclosed within these brackets will be varied to the extent necessary to reflect "issue specific" information.
Sex	
Age	
Owner	
Contract Number	
Contract Date	
Maturity Date	
Initial Premium Paid	
State Premium Tax Paid	Appears as zero unless contract is issued in a state where front-end premium taxes are applied. A dollar amount showing the amount of premium tax deducted from the Initial Premium is shown here.
Initial Premium Less Premium Tax	Dollar amount showing Initial Premium less any front-end premium tax paid.
Index One	Set on the Contract Date and will not change for the life of the contract. Only widely-published, unambiguous, measurable composite indices with a stable market for options will be chosen.
Index Two	Set on the Contract Date and will not change for the life of the contract. Only widely-published, unambiguous, measurable composite indices with a stable market for options will be chosen.
Index One Weight	Set on the Contract Date and will not change for the life of the contract. Is the percentage of the Index One Change applied in the calculation of the Index Credit. Will range from 0%-100%.
Index Two Weight	Set on the Contract Date and will not change for the life of the contract. Is the percentage of the Index One Change applied in the calculation of the Index Credit. Is equal to one less the Index One Weight. Will range from 0%-100%.
Fixed Rate Strategy – Initial Minimum Guaranteed Strategy Value Rate	Set on the Contract Date and will not change for the first nine contract years and will range from 1.0% to 3.0%. On the ninth contract anniversary and each contract anniversary thereafter, the Fixed Rate Strategy - Minimum Guaranteed Strategy Value Rate will be redetermined based on the five-year Constant Maturity Treasury as described on the Contract Data Page. The Fixed Rate Strategy - Minimum Guaranteed Strategy Value Rate is used only in the calculation of the Minimum Guaranteed Contract Value. The Fixed Rate Strategy - Minimum Guaranteed Strategy Value Rate is independent of the Fixed Rate Strategy - Minimum Guaranteed Interest Rate and the Fixed Rate Strategy - Initial Interest Rate.
Fixed Rate Strategy – Amount of Initial Premium	Initial Premium dollar amount that is elected to the Fixed Rate Strategy.
Fixed Rate Strategy – Premium Election Percentage	Percentage of premium paid that is elected to the Fixed Rate Strategy. The sum of percentages of premium elected to all strategies offered will equal 100%.
Fixed Rate Strategy – Initial Interest Rate	Applies to the Fixed Rate Strategy only. It is the initial interest rate credited to the associated portion of the Initial Premium elected to the strategy. It is determined by us and guaranteed for the first 12 months. The Fixed Rate Strategy - Initial

	Interest Rate and the renewal Interest Rate will never be less than the Fixed Rate Strategy - Minimum Guaranteed Interest Rate. The Fixed Rate Strategy - Initial Interest Rate is independent of the Fixed Rate Strategy - Minimum Guaranteed Strategy Value Rate.
Index Strategy(ies) – Initial Minimum Guaranteed Strategy Value Rate	Set on the Contract Date and will not change for the first nine contract years and will range from 1.0% to 3.0%. On the ninth contract anniversary and each contract anniversary thereafter, the Index Strategy(ies) - Minimum Guaranteed Strategy Value Rate will be redetermined based on the five-year Constant Maturity Treasury as described on the Contract Data Page. The Index Strategy(ies) - Minimum Guaranteed Strategy Value Rate is used only in the calculation of the Minimum Guaranteed Contract Value.
Point-to-Point Participation Index Strategy Rider, IU-RA-3068	This text and its associated amounts, election percentage and rates will appear when the Point-to-Point Participation Index Strategy Rider is attached.
Point-to-Point Participation Index Strategy Rider, IU-RA-3068– Amount of Initial Premium	Appears only when the Point-to-Point Participation Index Strategy Rider is attached. Initial Premium dollar amount that is elected to the Point-to-Point Participation Index Strategy.
Point-to-Point Participation Index Strategy Rider, IU-RA-3068– Premium Election Percentage	Appears only when the Point-to-Point Participation Index Strategy Rider is attached. Percentage of premium paid that is elected to the Point-to-Point Participation Index Strategy. The sum of percentages of premium elected to all strategies offered will equal 100%.
Point-to-Point Participation Index Strategy Rider, IU-RA-3068– Initial Participation Rate	Appears only when the Point-to-Point Participation Index Strategy Rider is attached. It is the initial percentage of the change in the Index that is used in calculating the Index Credit that will be applied to the associated portion of the Initial Premium elected to the strategy. It is determined by us for each strategy and guaranteed for the first 12 months. The Initial Participation Rate and the renewal Participation Rates will range from 10% to 150%.
The Participation Rate will never be less than 10% and will never exceed 150%	This text will appear when the Point-to-Point Participation Index Strategy Rider is attached.
Point-to-Point Cap Index Strategy Rider, IU-RA-3069	This text and its associated amounts, election percentage and rates will appear when the Point-to-Point Cap Index Strategy Rider is attached.
Point-to-Point Cap Index Strategy Rider, IU-RA-3069– Amount of Initial Premium	Appears only when the Point-to-Point Cap Index Strategy Rider is attached. Initial Premium dollar amount that is elected to the Point-to-Point Cap Index Strategy.
Point-to-Point Cap Index Strategy Rider, IU-RA-3069– Premium Election Percentage	Appears only when the Point-to-Point Cap Index Strategy Rider is attached. Percentage of premium paid that is elected to the Point-to-Point Cap Index Strategy. The sum of percentages of premium elected to all strategies offered will equal 100%.
Point-to-Point Cap Index Strategy Rider, IU-RA-3069 - Initial Index Cap	Appears only when the Point-to-Point Cap Index Strategy Rider is attached. It is the initial maximum amount of any Index Credit that can be applied to the associated portion of the Initial Premium elected to the Strategy. It is determined by us and guaranteed for the first 12 months. The Initial Index Cap and the renewal Index Cap will range from 2% to 100%.
The Index Cap will never be less than 2% and will never exceed 100%.	This text will appear when the Point-to-Point Cap Index Strategy Rider is attached.
Monthly Average Index Spread Strategy Rider, IU-RA-3070	This text and its associated amounts, election percentage and rates will appear when the Monthly Average Index Spread Strategy Rider is attached.
Monthly Average Index Spread Strategy Rider, IU-RA-3070 – Amount of Initial Premium	Appears only when the Monthly Average Index Spread Strategy Rider is attached. Initial Premium dollar amount that is elected to the Monthly Average Index Spread Strategy.
Monthly Average Index Spread Strategy	Appears only when the Monthly Average Index Spread

Rider, IU-RA-3070 – Premium Election Percentage	Strategy Rider is attached. Percentage of premium paid that is elected to the Monthly Average Index Spread Strategy. The sum of percentages of premium elected to all strategies offered will equal 100%.
Monthly Average Index Spread Strategy Rider, IU-RA-3070 – Initial Index Spread.	Appears only when the Monthly Average Index Spread Strategy Rider is attached. It is the amount subtracted from the result of the Index Change in calculating the Index Credit that will be applied to the associated portion of the Initial Premium elected to the strategy. It is determined by us and guaranteed for the first 12 months. The Initial Index Spread and the renewal Index Spread will range from 0% to 25%.
The Index Spread will never be less than 0% and will never exceed 25%	This text will appear when the Monthly Average Index Spread Strategy Rider is attached.
Monthly Cap Index Strategy Rider, IU-RA-3071	This text and its associated amounts, election percentage and rates will appear when the Monthly Average Index Spread Strategy Rider is attached.
Monthly Cap Index Strategy Rider, IU-RA-3071– Amount of Initial Premium	Appears only when the Monthly Cap Index Strategy Rider is attached. Initial Premium dollar amount that is elected to the Point-to-Point Performance Triggered Index Strategy.
Monthly Cap Index Strategy Rider, IU-RA-3071– Premium Election Percentage	Appears only when the Monthly Cap Index Strategy Rider, IU-RA-3071 is attached. Percentage of premium paid that is elected to the Monthly Cap Index Strategy. The sum of percentages of premium elected to all strategies offered will equal 100%.
Monthly Cap Index Strategy Rider, IU-RA-3071– Initial Monthly Cap	Appears only when the Monthly Cap Index Strategy Rider, IU-RA-3071 is attached. It is the maximum Monthly Index Change that may be applied in calculating the Index Credit. It is determined by us and guaranteed for the first 12 months. The Initial Monthly Cap and the renewal Monthly Cap will range from 0.5% to 25%.
The Monthly Cap will never be less than 0.5% and will never exceed 100%.	This text will appear when the Monthly Cap Index Strategy Rider is attached.
* "Standard & Poor's," "S&P 500," "Standard & Poor's 500," and "500" are trademarks of The McGraw-Hill Companies, Inc. and have been licensed for use by ING USA Annuity and Life Insurance Company. The product is not sponsored, endorsed, sold or promoted by Standard & Poor's and Standard & Poor's makes no representation regarding the advisability of purchasing the product.	Index One trademark language. Will consist of the trademark language that corresponds to Index One.
**Insert Index Two trademark language	Index Two trademark language. Will consist of the trademark language that corresponds to Index Two.



 Mary A. Borrelli, FSA, MAAA
 Actuary –Product Development
 ING USA Annuity and Life Insurance Company

9/24/10

 Date