

SERFF Tracking Number: PRUD-126884647 State: Arkansas
Filing Company: Pruco Life Insurance Company State Tracking Number: 47183
Company Tracking Number: P-END-MVASA(11/10)
TOI: A071 Individual Annuities - Special Sub-TOI: A071.002 Modified Guaranteed
Product Name: P-END-MVASA(11/10)
Project Name/Number: P-END-MVASA(11/10)/P-END-MVASA(11/10)

Filing at a Glance

Company: Pruco Life Insurance Company

Product Name: P-END-MVASA(11/10)

TOI: A071 Individual Annuities - Special

Sub-TOI: A071.002 Modified Guaranteed

Filing Type: Form

SERFF Tr Num: PRUD-126884647 State: Arkansas

SERFF Status: Closed-Approved- State Tr Num: 47183
Closed

Co Tr Num: P-END-MVASA(11/10) State Status: Approved-Closed

Reviewer(s): Linda Bird

Authors: Elaine Tweedus, John Disposition Date: 11/04/2010

Witteaman, Anthony Pereira, Carolyn

Cargnel, Pamela Bonaparte-

Golding, Corey Geissman, Starr

Merritt, Mila Shafir

Date Submitted: 11/01/2010

Disposition Status: Approved-
Closed

Implementation Date:

Implementation Date Requested: On Approval

State Filing Description:

General Information

Project Name: P-END-MVASA(11/10)

Project Number: P-END-MVASA(11/10)

Requested Filing Mode: Review & Approval

Status of Filing in Domicile: Not Filed

Date Approved in Domicile:

Domicile Status Comments: The enclosed form has not been submitted to our Home State, Arizona, as it is exempt pursuant to Arizona Revised statutes, Section 20-1110.F and the Exemptive Order dtd October 22, 2003

Market Type: Individual

Group Market Size:

Group Market Type:

Explanation for Other Group Market Type:

State Status Changed: 11/04/2010

Created By: Pamela Bonaparte-Golding

Corresponding Filing Tracking Number:

Explanation for Combination/Other:

Submission Type: New Submission

Overall Rate Impact:

Filing Status Changed: 11/04/2010

Deemer Date:

Submitted By: Pamela Bonaparte-Golding

Filing Description:

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VIA SERFF

November 1, 2010

Honorable Jay Bradford, Insurance Commissioner
Life and Health Division
Arkansas Insurance Department
200 West Third Street
Little Rock, AR 72201

Attn Claudia Meeks, Rates and Form Filings

RE: Pruco Life Insurance Company ("Pruco Life," "we," "us")
NAIC No.: 304- 79227 FEIN No.: 22-1944557

Form Submitted for Approval: P-END-MVASA(5/10) MVA Separate Account Endorsement

Dear Ms. Meeks:

Pruco Life Insurance Company respectfully submits the above captioned form for approval. The endorsement is new and does not replace any previously approved forms.

The endorsement will be used with previously approved contract forms which utilize a Market Value Adjustment (MVA) investment option. The purpose of the endorsement is to clarify that assets supporting our obligations arising from purchase payments allocated to any Market Value Adjustment investment options available in the contracts are held in a separate account established by Pruco Life, which account is not chargeable with liabilities arising out of any other business Pruco Life conducts.

This provision does not change the terms of the approved contracts or alter or reduce the contract owners' rights and benefits under the contracts in any manner. Therefore, we request your approval to issue this endorsement to both new and existing customers.

Any certifications or other materials Pruco Life believes you require are enclosed. Unless otherwise informed, Pruco Life reserves the right to alter the layout, color, sequential order, and typeface of this form. Pruco Life confirms that any such change will be in conformance with your requirements. Pruco Life also believes that the form is exempt from any "Flesch Score" or readability requirements or regulations under the provision exempting contracts filed as securities under federal law, because this form will be used with annuities that are so exempted.

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We appreciate your efforts and attention to this filing. If you have any questions or need additional information to assist in your review, please do not hesitate to contact me.

Very truly yours,

Pamela Bonaparte-Golding
 Contract Specialist
 Phone: (203) 944-7544, Fax: (203) 944-7737
 Email: pamela.bonaparte-golding@prudential.com

Company and Contact

Filing Contact Information

Anthony Pereira, Senior Compliance Analyst Anthony.Pereira@Prudential.com
 One Corporate Drive 800-628-6039 [Phone] 57146 [Ext]
 P.O. Box 883 203-944-7510 [FAX]
 Shelton, CT 06484

Filing Company Information

Pruco Life Insurance Company CoCode: 79227 State of Domicile: Arizona
 751 Broad Street Group Code: 304 Company Type: Life
 Newark, NJ 07102-3777 Group Name: State ID Number:
 (973) 802-6000 ext. [Phone] FEIN Number: 22-1944557

Filing Fees

Fee Required? No
 Retaliatory? No
 Fee Explanation:
 Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Pruco Life Insurance Company	\$25.00	11/01/2010	41367967
Pruco Life Insurance Company	\$25.00	11/02/2010	41426136

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Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved-Closed	Linda Bird	11/04/2010	11/04/2010

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	11/02/2010	11/02/2010	Pamela Bonaparte-Golding	11/02/2010	11/02/2010

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Disposition

Disposition Date: 11/04/2010

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		Yes
Supporting Document	Application		No
Supporting Document	Life & Annuity - Acturial Memo		No
Supporting Document	P-END-MVASA(11/10) Memo of Variability		Yes
Supporting Document	Cover Letter Arkansas		Yes
Supporting Document	Fee Form		Yes
Supporting Document	Certificate of Compliance		Yes
Form	MVA SEPARATE ACCOUNT ENDORSEMENT		Yes

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Objection Letter

Objection Letter Status Pending Industry Response
Objection Letter Date 11/02/2010
Submitted Date 11/02/2010
Respond By Date 12/02/2010

Dear Anthony Pereira,

This will acknowledge receipt of the captioned filing.

Objection 1

Comment: Regulation 57 was revised effective January 2010, the filing fee is now \$50.00 per form. We will hold your filing in a pending status until the additional \$25.00 is received.

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 11/02/2010
Submitted Date 11/02/2010

Dear Linda Bird,

Comments:

Ms. Bird,

I thank you for your comments dated November 2, 2010.

Response 1

Comments: Please know the additional \$25.00 has been sent via EFT to the department for the review of this submission. This can be seen on the Filing Fees tab.

Related Objection 1

Comment:

Regulation 57 was revised effective January 2010, the filing fee is now \$50.00 per form. We will hold your filing in a pending status until the additional \$25.00 is received.

Changed Items:

No Supporting Documents changed.

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

I apologize for the inconvenience and thank you for your continued review of our submission. Should there be any further questions or concerns please feel free to contact the undersigned directly.

Sincerely,

Pamela Bonaparte-Golding
Contract Specialist
(203) 944-7544
Pamela.Bonaparte-Golding@Prudential.com

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Sincerely,

Anthony Pereira, Carolyn Cargnel, Corey Geissman, Elaine Tweedus, John Witteman, Mila Shafir, Pamela Bonaparte-Golding, Starr Merritt

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Form Schedule

Lead Form Number: P-END-MVASA(11/10)

Schedule Item Status	Form Number	Form Type	Form Name	Action	Action Specific Data	Readability	Attachment
	P-END-MVASA(11/10)	Policy/Contract	MVA SEPARATE ACCOUNT ENDORSEMENT Certificate: Amendment, Insert Page, Endorsement or Rider	Initial			P-END-MVASA(11-10).pdf

PRUCO LIFE INSURANCE COMPANY
[2999 North 44th Street, Suite 250
Phoenix, Arizona 85014]

MVA SEPARATE ACCOUNT ENDORSEMENT

This Endorsement is made a part of your Annuity. It is effective as of the Issue Date of your Annuity. If the terms of your Annuity and those of this Endorsement conflict the provisions of this Endorsement shall control. The following provision is added to your Annuity:

MVA SEPARATE ACCOUNT

We have established a MVA Separate Account to hold the assets supporting our obligations based on allocations to market value adjustment investment options of this and similar contracts. The assets of the MVA Separate Account are held in the name of Pruco Life Insurance Company and legally belong to us. That portion of the assets of the MVA Separate Account equal to the reserves and other contract liabilities are kept separate from all our other assets and may not be charged with liabilities arising out of any other business we may conduct.

PRUCO LIFE INSURANCE COMPANY


[_____]
Secretary

SERFF Tracking Number: PRUD-126884647 State: Arkansas
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Supporting Document Schedules

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

	Item Status:	Status Date:
Satisfied - Item: P-END-MVASA(11/10) Memo of Variability		
Comments:		
Attachment: P-END-MVASA(11-10) Memo of Variability.pdf		

	Item Status:	Status Date:
Satisfied - Item: Cover Letter Arkansas		
Comments:		
Attachment: Pruco MVA Sep Acct Filing Letter -Arkansas.pdf		

	Item Status:	Status Date:
Satisfied - Item: Fee Form		
Comments:		
Attachment: AR - 7a PRU.pdf		

	Item Status:	Status Date:
Satisfied - Item: Certificate of Compliance		

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Comments:

Attachment:

AR - 7._PRU.pdf

State of Arkansas Certification of Readability Compliance

Company Name: Pruco Life Insurance Company

Form Title(s) = MVA Separate Account Endorsement

Form Number(s) = P-END-MVA (11/10)

I hereby certify that to the best of my knowledge and belief the above form submission complies with the readability regulations in your state.



Suzanne Hurel, Vice President - Contracts

November 1, 2010

Date

PRUCO LIFE INSURANCE COMPANY

**MEMORANDUM OF VARIABILITY FOR
ENDORSEMENT P-END-MVASA(11/10)**

Brackets in the referenced Endorsement designate any variable material. For any designated class of Annuity purchaser the values shown within brackets in the referenced Endorsement will not be applied in a discriminatory manner.

Company Address	The current Company address is as indicated in the referenced annuity forms. The address is subject to change over time.
Officer's Signature	The Officer's signature is shown within brackets to indicate that we reserve the right to change such information based on any possible future officer change.



Prudential Annuities
1 Corporate Dr
Shelton, CT 06484
Tel 800-752-6342
Fax 203-944-7737

A business of Prudential Financial, Inc.

VIA SERFF

November 1, 2010

Honorable Jay Bradford, Insurance Commissioner
Life and Health Division
Arkansas Insurance Department
200 West Third Street
Little Rock, AR 72201

Attn Claudia Meeks, Rates and Form Filings

RE: Pruco Life Insurance Company ("Pruco Life," "we," "us")
NAIC No.: 304- 79227 FEIN No.: 22-1944557

Form Submitted for Approval: P-END-MVASA(11/10) MVA Separate Account Endorsement

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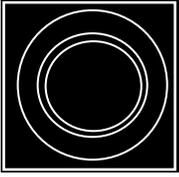
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We appreciate your efforts and attention to this filing. If you have any questions or need additional information to assist in your review, please do not hesitate to contact me.

Very truly yours,

Pamela Bonaparte-Golding
Contract Specialist
Phone: (203) 944-7544, Fax: (203) 944-7737
Email: pamela.bonaparte-golding@prudential.com



**ARKANSAS
INSURANCE
DEPARTMENT**

400 University Tower Building
1123 South University Ave.
Little Rock, Arkansas 72204

Lee Douglass
Insurance Commissioner

501-686-2900

ATTN: LIFE & HEALTH DIVISION, ARKANSAS INSURANCE DEPARTMENT

Company Name: Pruco Life Insurance Company

Company NAIC Code: 79227

Company Contact Person & Telephone # Pamela Bonaparte-Golding (203) 944-7544

INSURANCE DEPARTMENT USE ONLY

ANALYST: _____ AMOUNT: _____ ROUTE SLIP: _____

ALL FEES ARE PER EACH INSURER. PER ANNUAL STATEMENT LINE OF BUSINESS.
UNLESS OTHERWISE INDICATED.

FEE SCHEDULE FOR ADMITTED INSURERS

RATE/FORM FILINGS

Life and/or Disability policy form filing and review, per each policy, contract, annuity form, per each insurer, per each filing. * 1x \$ 50 = 50
**Retaliatory__

Life and/or Disability - Filing and review of each rate filing or loss ratio guarantee filing, per each insurer. * ___x \$ 50 = ___
**Retaliatory__

Life and/or Disability: Filing and review of Annuity Forms: Filing and review of each certificate, rider, endorsement or application if each is filed separately from the basic form. * x \$ 20 = \$
**Retaliatory__

Life and/or Disability: Filing and review of Insurer's advertisements, per advertisement, per each insurer. * ___x \$ 25 = ___
**Retaliatory__

AMEND CERTIFICATE OF AUTHORITY

Review and processing of information to amend an Insurer's Certificate of Authority. * ___ x \$400=___

Filing to amend Certificate of Authority. ***___x \$100=___

*THESE FEES ARE PAYABLE UNDER THE NEW FEE SCHEDULE AS OUTLINED UNDER RULE AND REGULATION 57.

**THESE FEES ARE PAYABLE UNDER THE OLD FEE SCHEDULE AS OUTLINED UNDER ARK. CODE ANN. 23-63-102, RETALIATORY TAX.

***THESE FEES ARE PAYABLE AS REQUIRED IN ARK. ANN. § 23-61-401.

**Pruco Life Insurance Company
751 Broad Street, Plaza Building
Newark, NJ 07102**

STATE OF ARKANSAS

CERTIFICATION OF COMPLIANCE

I hereby certify that Pruco Life Insurance Company complies with the requirements of Rules and Regulation #34 of the Arkansas Insurance Department regarding our Form No. P-END-MVASA (11/10).



Suzanne Hurel – VP, Contracts

October 29, 2010

Date