

SERFF Tracking Number: PRUD-126510717 State: Arkansas  
Filing Company: Pruco Life Insurance Company State Tracking Number: 44937  
Company Tracking Number: 0165309-00001-00 LB PRU AR  
TOI: A03G Group Annuities - Deferred Variable Sub-TOI: A03G.002 Flexible Premium  
Product Name: 0165309-00001-00 Pru  
Project Name/Number: 0165309-00001-00 Pru/0165309-00001-00 Pru

## Filing at a Glance

Company: Pruco Life Insurance Company

Product Name: 0165309-00001-00 Pru SERFF Tr Num: PRUD-126510717 State: Arkansas  
TOI: A03G Group Annuities - Deferred Variable SERFF Status: Closed-Filed- State Tr Num: 44937  
Closed

Sub-TOI: A03G.002 Flexible Premium Co Tr Num: 0165309-00001-00 LB State Status: Filed-Closed  
PRU AR

Filing Type: Form

Reviewer(s): Linda Bird

Author: Andrea Knazik

Disposition Date: 02/23/2010

Date Submitted: 02/22/2010

Disposition Status: Filed-Closed

Implementation Date Requested: On Approval

Implementation Date:

State Filing Description:

## General Information

Project Name: 0165309-00001-00 Pru

Status of Filing in Domicile: Not Filed

Project Number: 0165309-00001-00 Pru

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: 02/23/2010

Explanation for Other Group Market Type:

State Status Changed: 02/23/2010

Deemer Date:

Created By: Andrea Knazik

Submitted By: Andrea Knazik

Corresponding Filing Tracking Number:

0165309-00001-00 LB Pru AR

Filing Description:

see supporting doc. cover letter.

## Company and Contact

### Filing Contact Information

Louis Bunosso, Manager, Annuities

[louis.bunosso@prudential.com](mailto:louis.bunosso@prudential.com)

Compliance

Prudential

203-944-7522 [Phone]

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1 Corporate Dr.  
 Shelton, CT 06484-6208

**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	

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**Filing Fees**

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

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Pruco Life Insurance Company	\$50.00	02/22/2010	34345828

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## Correspondence Summary

### Dispositions

Status	Created By	Created On	Date Submitted
Filed-Closed	Linda Bird	02/23/2010	02/23/2010

*SERFF Tracking Number:* PRUD-126510717      *State:* Arkansas  
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## **Disposition**

Disposition Date: 02/23/2010

Implementation Date:

Status: Filed-Closed

Comment:

Rate data does NOT apply to filing.

*SERFF Tracking Number:* PRUD-126510717      *State:* Arkansas  
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<b>Schedule</b>	<b>Schedule Item</b>	<b>Schedule Item Status</b>	<b>Public Access</b>
<b>Supporting Document</b>	Flesch Certification		No
<b>Supporting Document</b>	Application		No
<b>Supporting Document</b>	Life & Annuity - Acturial Memo		No
<b>Supporting Document</b>	cover letter		Yes
<b>Form</b>	PPR Optional Accumulation & Death Benefits Brochure		Yes

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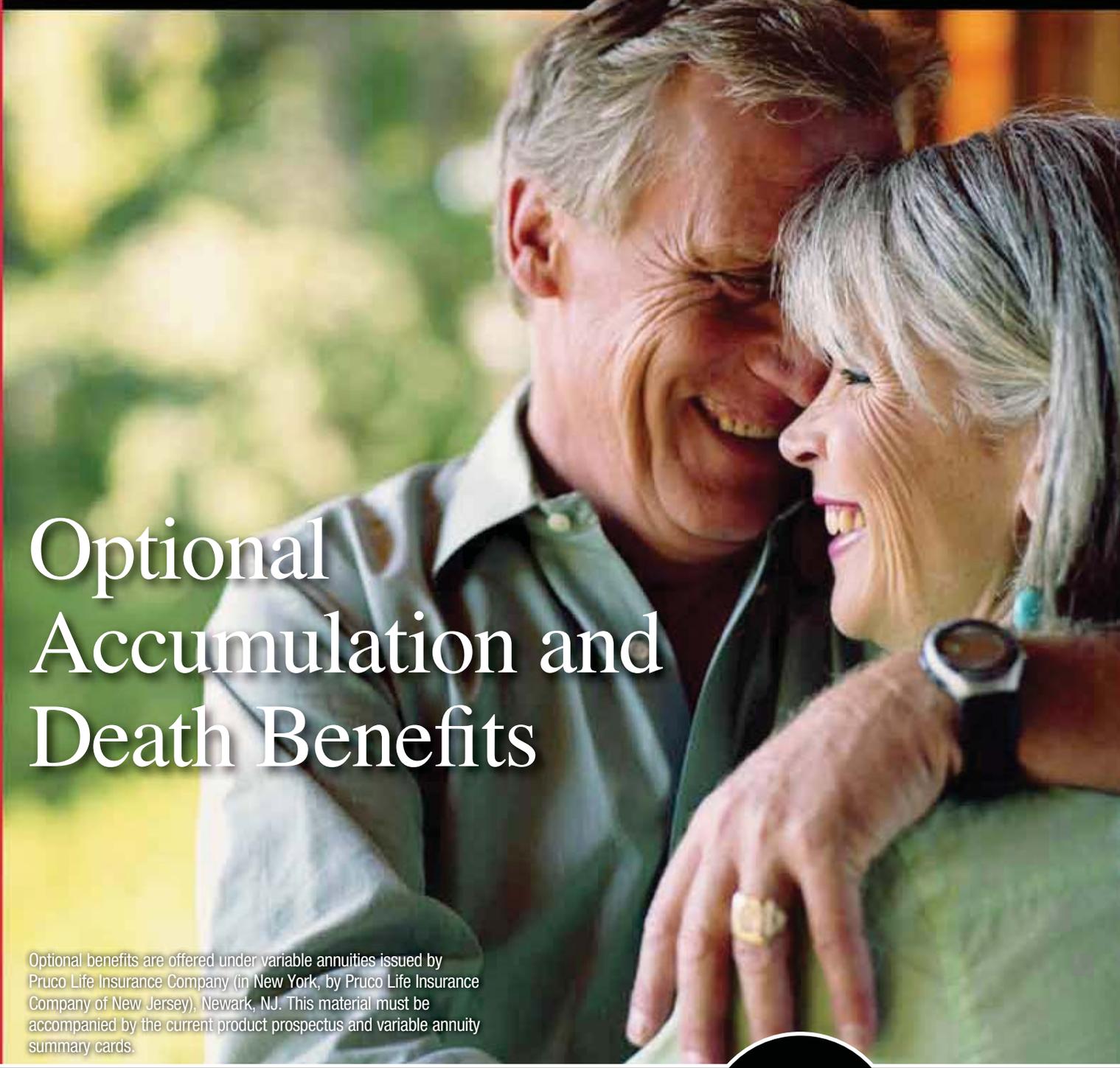
## Form Schedule

**Lead Form Number: 0165309-00001-00 LB Pru AR**

Schedule Item Status	Form Number	Form Type Form Name	Action	Action Specific Data	Readability	Attachment
	0165309-00001-00	Advertising PPR Optional Accumulation & Death Benefits Brochure	Initial		0.000	0165309-00001-00.pdf



Prudential  
Premier® Retirement



# Optional Accumulation and Death Benefits

Optional benefits are offered under variable annuities issued by Pruco Life Insurance Company (in New York, by Pruco Life Insurance Company of New Jersey), Newark, NJ. This material must be accompanied by the current product prospectus and variable annuity summary cards.

**ANNUITIES:**

NOT FDIC OR GOVERNMENT  
AGENCY INSURED

MAY LOSE VALUE

NOT BANK OR CREDIT  
UNION GUARANTEED



**Prudential**



# Highest Daily<sup>SM</sup> Guaranteed Return Option<sup>SM</sup> II (HD GRO<sup>SM</sup> II)

Provides principal protection with daily opportunities to lock in positive performance

## 1 PRINCIPAL PROTECTION

- The HD GRO II benefit provides an initial guarantee that your account value will be equal to 100% of the purchase payments\* 10 years after you elect the benefit (provided all contract provisions are met)

## 2 UPSIDE OPPORTUNITY

- With HD GRO II, you have the opportunity to automatically lock in new guarantees each year based on the annuity's highest daily value

## 3 FLEXIBILITY AND CONTROL

- Does not require annuitizing or surrendering the contract to receive the guarantee amount
- Invest in one or a combination of professionally managed asset allocation portfolios or create your own personalized portfolio by selecting from a broad spectrum of individual investment options

## AT A GLANCE

### ANNUAL COST: 0.60%

Fees are assessed daily against the average net assets of the subaccounts. Benefit fees are in addition to fees and charges associated with the underlying annuity

### ISSUE AGES

**Minimum:** None

**Maximum:** 84; may vary by state and/or broker/dealer

- Benefit may be elected either at contract issue or after your contract is issued
- Benefit may be cancelled at any time. Any and all guarantees are lost upon cancellation. If cancelled, the benefit may be re-elected on any day beginning with the following business day (provided investment allocation requirements are in good order). May vary by state and/or broker/dealer. Please note, benefit fee may be higher upon re-election
- Benefit fee ends upon cancellation
- Withdrawals will reduce all guarantees proportionally

\* If adding HD GRO II to an existing annuity, the initial guarantee equals the account value at the time of benefit election. Guarantees are adjusted for any credits, withdrawals and subsequent purchase payments.

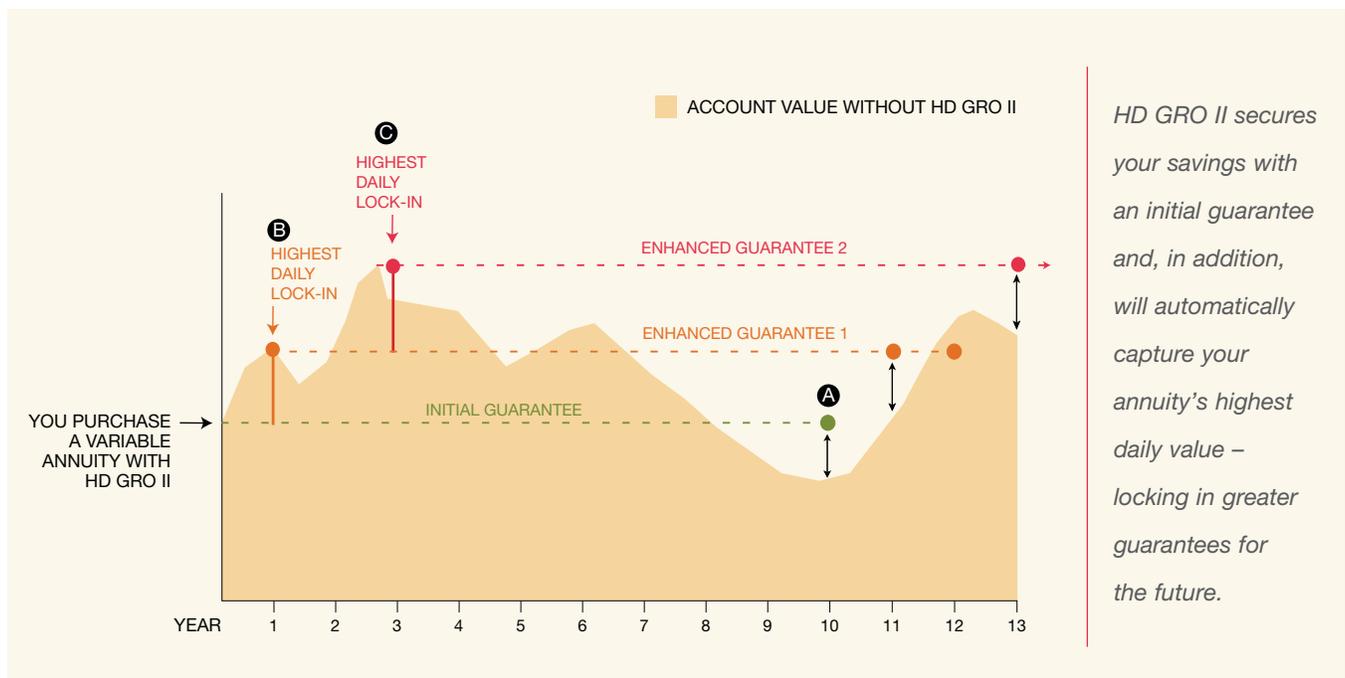
HD GRO II uses a predetermined mathematical formula to help manage your guarantee through all market cycles. Each business day, the formula determines if any portion of the account value needs to be transferred into or out of the AST Bond Portfolio Subaccounts. For more information on how the guarantee is managed, please see page 7.

All references to account value assume no investment in any available Market Value Adjustment Options. Please see the prospectus for more information.

# How HD GRO II works

## In this example, HD GRO II...

- Guarantees your initial purchase payment after 10 years **A**
- Automatically captures your highest daily value at the end of the first year **B**, which will mature in year 11 and again in year 12 since no additional guarantee was captured in year 2
- Captures an additional guarantee in year 3 **C**, which matures in year 13 and on every anniversary thereafter (unless a higher enhanced guarantee is locked in)
- When a guarantee matures, HD GRO II will compare your account value to the guaranteed amount. If the account value is less, HD GRO II will add money to your annuity so that the account value equals the amount of the guarantee



This hypothetical example is for illustrative purposes only and is not meant to represent the performance of any specific annuity. The account value depicted is not the actual account value under the benefit, but a representation of account performance without the guarantee in place. If this were an actual example, various costs would be factored into the gross return, including annual insurance charges of the annuity, annual maintenance fees, investment management fees of the variable subaccounts, the cost for any optional features, and any other applicable fees. Please read the prospectus carefully for descriptions of the underlying costs. All guarantees, including optional benefits, are backed by the claims-paying ability of the issuing company and do not apply to the underlying investment options. Withdrawals reduce the living benefit, death benefit and account value.



# Guaranteed Return Option<sup>SM</sup> Plus II (GRO Plus II)

Provides principal protection with opportunities to lock in positive performance

## 1 PRINCIPAL PROTECTION

- The GRO Plus II benefit provides an initial guarantee that the account value will be equal to 100% of your purchase payments\* after seven years and on each anniversary thereafter (provided all contract provisions are met)

## 2 UPSIDE OPPORTUNITY

- With GRO Plus II, if the account value increases due to positive investment performance, you can lock in a higher guarantee while retaining the initial GRO Plus II guarantee
- **Automatic Enhanced Guarantee Feature** – you can elect to automatically step up the guarantee on any benefit anniversary where the account value is at least 7% higher than the current highest guarantee amount

## 3 FLEXIBILITY AND CONTROL

- Does not require annuitizing or surrendering the annuity to receive the guarantee
- Invest in one or a combination of professionally managed asset allocation portfolios or create your own personalized portfolio by selecting from a broad spectrum of individual investment options

## AT A GLANCE

### ANNUAL COST: 0.60%

Fees are assessed daily against the average net assets of the subaccounts. Benefit fees are in addition to fees and charges associated with the underlying annuity

### ISSUE AGES

**Minimum:** None

**Maximum:** 84; may vary by state and/or broker/dealer

- Benefit may be elected either at contract issue or after your contract is issued
- Benefit may be cancelled at any time. Any and all guarantees are lost upon cancellation. If cancelled, the benefit may be re-elected on any day beginning with the following business day (provided investment allocation requirements are in good order). May vary by state and/or broker/dealer. Please note, benefit fee may be higher upon re-election
- If a new enhanced guarantee is locked in, it replaces the prior enhanced guarantee and matures seven years from the date of lock-in
- Benefit fee ends upon cancellation
- Withdrawals will reduce all guarantees proportionally

\* If adding GRO Plus II to an existing annuity, the initial guarantee equals the account value at the time of benefit election. Guarantees are adjusted for any credits, withdrawals and subsequent purchase payments.

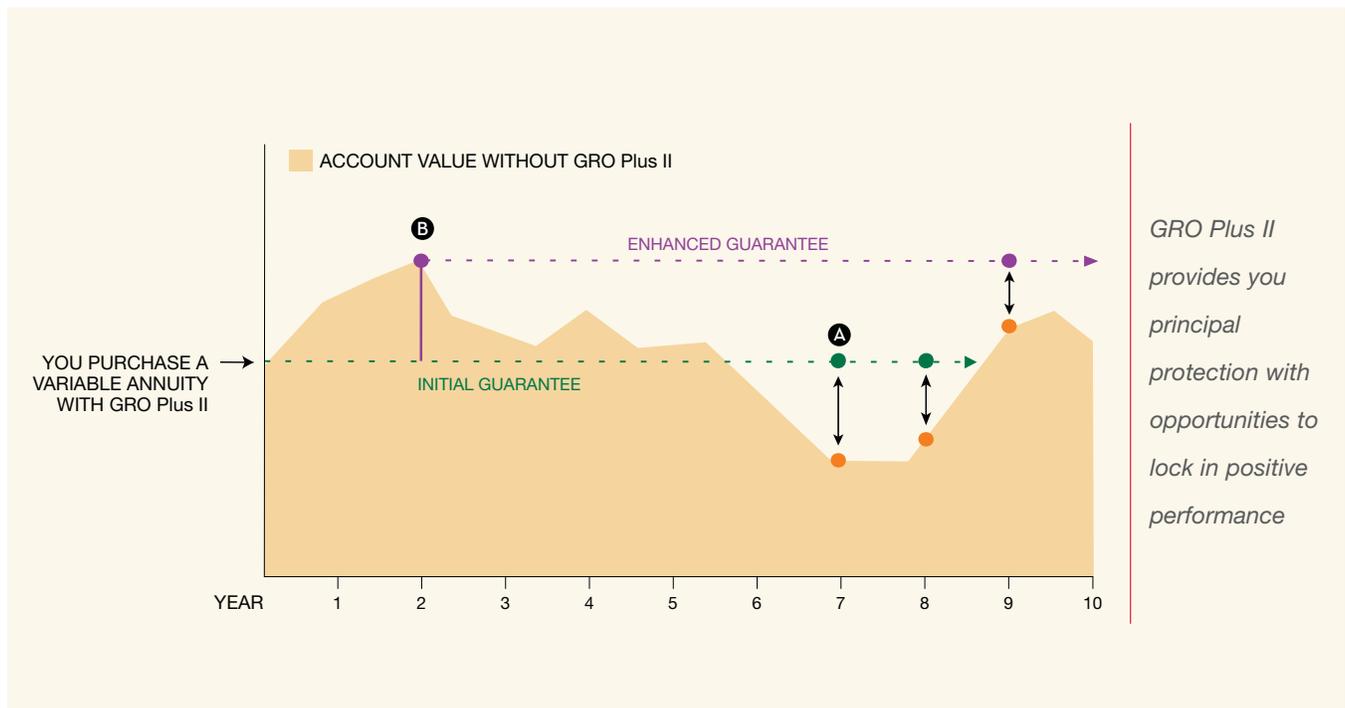
GRO Plus II uses a predetermined mathematical formula to help manage your guarantee through all market cycles. Each business day, the formula determines if any portion of the account value needs to be transferred into or out of the AST Bond Portfolio Subaccounts. For more information on how the guarantee is managed, please see page 7.

All references to account value assume no investment in any available Market Value Adjustment Options. Please see the prospectus for more information.

# How GRO Plus II works

## In this example, GRO Plus II...

- Guarantees your initial purchase payment after seven years and on every anniversary thereafter **A**
- Provides you with the ability to capture investment growth by locking in an enhanced guarantee in year 2 **B**
- On the day each guarantee matures, GRO Plus II compares your account value to the guaranteed amount. If your account value is less, GRO Plus II adds money to your annuity so that the account value equals the guarantee



This hypothetical example is for illustrative purposes only and is not meant to represent the performance of any specific annuity. The account value depicted is not the actual account value under the benefit, but a representation of account performance without the guarantee in place. If this were an actual example, various costs would be factored into the gross return, including annual insurance charges of the annuity, annual maintenance fees, investment management fees of the variable subaccounts, the cost for any optional features, and any other applicable fees. Please read the prospectus carefully for descriptions of the underlying costs. All guarantees, including optional benefits, are backed by the claims-paying ability of the issuing company and do not apply to the underlying investment options. Withdrawals reduce the living benefit, death benefit and account value.



## Combination 5% Roll-up & HAV

*Availability varies by state; not available in NY  
May not be available with all broker/dealers*

## Highest Anniversary Value (HAV)

*Availability varies by state; may not be available  
with all broker/dealers*

Your beneficiaries will receive the greater of the annuity's minimum death benefit or, if elected, one of the optional enhanced death benefits as detailed below.

- **Roll-up value:** Purchase payments (plus any applicable credits) credited 5% annually up to the contract anniversary on or immediately after the 80th birthday of the oldest owner or the annuitant (if entity-owned), or the fifth contract anniversary, whichever is later (withdrawals reduce the roll-up value dollar-for-dollar up to the dollar-for-dollar limit)
- **Highest Anniversary Value (HAV):** The highest of all previous contract anniversary values (adjusted for subsequent purchase payments and withdrawals), up to the contract anniversary on or immediately after the 80th birthday of the oldest owner or the annuitant (if entity-owned), or the fifth contract anniversary, whichever is later
- **Current account value**

### At A Glance

- Annual cost of 0.80%, which is assessed daily against the average net assets of the subaccounts
- Maximum issue age – 79; subject to firm restrictions
- May be elected at issue only and cannot be cancelled
- Withdrawals reduce the HAV death benefit proportionally. Guarantees will be reduced by all withdrawals; some withdrawals will reduce the guarantees proportionally
- Invest in one or a combination of professionally managed asset allocation portfolios or create your own personalized portfolio by selecting from a broad spectrum of individual investment options

- **Highest Anniversary Value (HAV):** The highest of all previous contract anniversary values (adjusted for subsequent purchase payments and withdrawals) up to the contract anniversary on or immediately after the 80th birthday of the oldest owner or annuitant (if entity-owned) or the fifth contract anniversary, whichever is later
- **Total purchase payments plus any applicable credits less any withdrawals**
- **Current account value**

### At A Glance

- Annual cost of 0.40%, which is assessed daily against the average net assets of the subaccounts
- Maximum issue age – 79; subject to firm restrictions
- May be elected at issue only and cannot be cancelled
- Withdrawals reduce the HAV death benefit proportionally
- Invest in one or a combination of professionally managed asset allocation portfolios or create your own personalized portfolio by selecting from a broad spectrum of individual investment options

All references to account value assume no investment in any available Market Value Adjustment Options.

Benefit fees are in addition to fees and charges associated with the basic annuity.

Please note that for all optional death benefits, we will reduce the death benefit amount by any credits applied within 12 months prior to the date of death (may vary by state). May not be elected in conjunction with certain other optional benefits. Death benefit protection terminates upon contract annuitization. For more information regarding provisions associated with the minimum death benefit and any optional death benefits you may elect, please see the prospectus.

# How a Variable Annuity can help you

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A variable annuity is appropriate for long-term investing and designed for retirement purposes. An annuity can help you manage investment risks in many ways, including the ability to invest in equities, fixed income and other securities through a broad range of professionally managed investment options. An annuity also provides payment options to help meet your income needs.

Only Prudential Annuities® offers a suite of optional benefits that for an additional fee can capture your annuity's highest daily value, providing you with a measure of principal protection during market downturns, guaranteed lifetime income or a legacy for your beneficiaries.

*Let us be your Rock for retirement.*

## How we Manage your Guarantees

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Highest Daily Guaranteed Return Option II (HD GRO II) and Guaranteed Return Option Plus II (GRO Plus II) use a predetermined mathematical formula to help manage your guarantees through all market cycles. Each business day, the formula determines if any portion of your account value needs to be transferred into or out of certain AST Bond Portfolio Subaccounts (the "Bond Portfolios"). Amounts transferred by the formula depend on a number of factors unique to your individual annuity and include:

- (i) The difference between the account value and the Guarantee Amount(s);
- (ii) The amount of time until the maturity of the Guarantee(s);
- (iii) The amount invested in, and the performance of, the permitted subaccounts;
- (iv) The amount invested in, and the performance of, the Bond Portfolios;
- (v) The discount rate used to determine the present value of the Guarantee(s); and
- (vi) The impact of additional purchase payments made to and withdrawals taken from the annuity.

Therefore, at any given time, some, none, or most of the account value may be allocated to the Bond Portfolios. Transfers to and from the Bond Portfolios do not impact any guarantees that have already been locked in.

Any amounts invested in the Bond Portfolios will affect your ability to participate in a subsequent market recovery within the permitted subaccounts. Conversely, the account value may be higher at the beginning of the market recovery; e.g., more of the account value may have been protected from decline and volatility than it otherwise would have been had the benefit not been elected. Please note: You may not allocate purchase payments or transfer account value into or out of the Bond Portfolios. See the prospectus for complete details.

**For HD GRO II, GRO Plus II and the Optional Death Benefits:** When creating your own portfolio, certain subaccount limitations apply and you will need to maintain a minimum 20% allocation in one or more of the eligible bond subaccounts. For a list of available asset allocation portfolios and subaccounts, please refer to the prospectus.

ONE CORPORATE DRIVE  
SHELTON, CONNECTICUT 06484

**Investors should consider the contract and the underlying portfolios' investment objectives, risks, charges and expenses carefully before investing. This and other important information is contained in the prospectus, which can be obtained from your financial professional. Please read the prospectus carefully before investing.**

This material was prepared to support the promotion and marketing of variable annuities available through Prudential. Prudential, its affiliates, its distributors and their respective representatives do not provide tax, accounting or legal advice. Any tax statements contained herein were not intended or written to be used, and cannot be used for the purpose of avoiding U.S. federal, state or local tax penalties. Please consult your own independent advisor as to any tax, accounting or legal statements made herein.

Your needs and the suitability of an annuity product should be carefully considered before investing. When evaluating your needs, please consider other variable annuities available from Prudential Financial companies.

The Premier Retirement Variable Annuities offered by Pruco Life Insurance Company (in New York, by Pruco Life Insurance Company of New Jersey), Newark, NJ are available for Total Annual Insurance Charges of 0.55% to 1.85%, with an additional fee related to the professional investment options.

Variable annuities are appropriate for long-term investing and designed for retirement purposes. Investment return and principal value of an investment will fluctuate so that an investor's unit values, when redeemed, may be worth more or less than their original cost. Withdrawals or surrenders may be subject to contingent deferred sales charges (CDSC). Withdrawals and distributions of taxable amounts are subject to ordinary income tax and, if made prior to age 59½, may be subject to an additional 10% federal income tax penalty. Withdrawals, for tax purposes, are deemed to be gains out first. Withdrawals reduce the living benefit, death benefit and account value.

Fixed income investing is subject to risk, including credit and interest rate risk. Because of these risks, a subaccount's share value may fluctuate. If interest rates rise, bond prices usually decline. If interest rates decline, bond prices usually increase.

Annuity contracts contain exclusions, limitations, reductions of benefits and terms for keeping them in force. Your licensed financial professional can provide you with complete details.

Optional living and death benefits may not be available in every state and may not be elected in conjunction with certain optional benefits. Optional benefits have certain investment, holding period, liquidity, and withdrawal limitations and restrictions. The benefit fees are in addition to fees and charges associated with the basic annuity. Please see the prospectus for more information. All guarantees, including optional benefits, are backed by the claims-paying ability of the issuing company and do not apply to the underlying investment options.

Variable annuities are issued by Pruco Life Insurance Company (in New York, by Pruco Life Insurance Company of New Jersey), Newark, NJ and distributed by Prudential Annuities Distributors, Inc., Shelton, CT. All are Prudential Financial companies and each is solely responsible for its own financial condition and contractual obligations. Prudential Annuities is a business of Prudential Financial, Inc.

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Issued on riders: P-RID-HDGRO(11/09), P-RID-GRO(2/10), P-RID-HAVROLL (2/10), P-RID-HAV(2/10), et al. or state variation thereof.



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## Supporting Document Schedules

	<b>Item Status:</b>	<b>Status Date:</b>
<b>Bypassed - Item:</b> Flesch Certification		
<b>Bypass Reason:</b> n/a for advertisements		
<b>Comments:</b>		

	<b>Item Status:</b>	<b>Status Date:</b>
<b>Bypassed - Item:</b> Application		
<b>Bypass Reason:</b> n/a for advertisements		
<b>Comments:</b>		

	<b>Item Status:</b>	<b>Status Date:</b>
<b>Satisfied - Item:</b> cover letter		
<b>Comments:</b>		
<b>Attachment:</b>		
LB Cover letter 0165309-00001-00 AR.pdf		



Louis Bunosso  
Manager, Compliance

**Prudential Annuities**  
One Corporate Drive  
Shelton, CT 06484  
Tel (203) 402-1460

February 22, 2010

Arkansas Department of Insurance  
1200 West Third Street  
Little Rock, AR 72201-1904

Re: **Advertising Materials:**  
Pruco Life Insurance Co. NAIC #79227

To Whom It May Concern:

On behalf of Pruco Life Insurance Co, wholly owned subsidiary of The Prudential Insurance Company of America, and pursuant to applicable State requirements, I am enclosing the following advertising material(s):

<b>Control #</b>	<b>Material Title</b>	<b>Edition Date</b>
0165309-00001-00	PPR Optional Accumulation & Death Benefits Brochure	3/2010

Please let me know if you require any additional information.

Sincerely,

Louis Bunosso  
Manager, Compliance

Encl.