

SERFF Tracking Number: INGD-126547937 State: Arkansas  
Filing Company: Security Life of Denver Insurance Company State Tracking Number: 45624  
Company Tracking Number: R1376  
TOI: L09I Individual Life - Flexible Premium Sub-TOI: L09I.001 Single Life  
Adjustable Life  
Product Name: R1376 WSC Rider  
Project Name/Number: R1376 WSC Rider/R1376 WSC Rider

## Filing at a Glance

Company: Security Life of Denver Insurance Company

Product Name: R1376 WSC Rider SERFF Tr Num: INGD-126547937 State: Arkansas  
TOI: L09I Individual Life - Flexible Premium SERFF Status: Closed-Approved- State Tr Num: 45624  
Adjustable Life Closed  
Sub-TOI: L09I.001 Single Life Co Tr Num: R1376 State Status: Approved-Closed  
Filing Type: Form Reviewer(s): Linda Bird  
Disposition Date: 05/12/2010  
Authors: Wendy Paquin, Terry Stumpf, Jackie Williams, EDS  
EDSSupport, Laura Sampair  
Date Submitted: 05/10/2010 Disposition Status: Approved-Closed  
Implementation Date: Implementation Date:

Implementation Date Requested: On Approval  
State Filing Description:

## General Information

Project Name: R1376 WSC Rider  
Project Number: R1376 WSC Rider  
Requested Filing Mode: Review & Approval

Status of Filing in Domicile: Pending  
Date Approved in Domicile:  
Domicile Status Comments: This form was filed simultaneously in Colorado, our state of domicile.

Explanation for Combination/Other:  
Submission Type: New Submission  
Overall Rate Impact:  
Filing Status Changed: 05/12/2010

Market Type: Individual  
Group Market Size:  
Group Market Type:  
Explanation for Other Group Market Type:  
State Status Changed: 05/12/2010  
Created By: Wendy Paquin  
Corresponding Filing Tracking Number:

Deemer Date:  
Submitted By: Wendy Paquin  
Filing Description:  
May 10, 2010

Insurance Commissioner  
Department of Insurance

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**Compliance Life & Health**

1200 West Third Street  
Little Rock, Arkansas 72201-1904

Re: Security Life of Denver Insurance Company  
NAIC #68713 FEIN #84-0499703

Form Number: R1376-07/10 Waiver of Surrender Charge Rider

Attention Policy Form Approval Division:

We submit the above referenced form for your review and approval. The form does not replace any previously approved form. The form does not contain any unusual or controversial items from the standpoint of industry standards.

We are exempt from filing in Colorado, our state of domicile, pursuant to Colorado Bulletin B-4.1 (May 8, 2007), however Colorado is included as a member state in our Interstate Compact filing.

The information bracketed in the form is subject to change.

The Waiver of Surrender Charge Rider (the "Rider") provides that we will waive a specified percentage of the surrender charge to be subtracted from the policy's account value on the occurrence of a full surrender of the policy, subject to the conditions and limits identified in the Rider. This Rider will be available for both our fully underwritten and guaranteed issue policies on the approved life policy shown below (the "Policy") and on other policies that we may identify in the future.

The following previously approved Policy form will be marketed with the submitted Rider (approval date provided):

ICC09 1180-12/09 - Flexible Premium Adjustable Universal Life Insurance Policy - 12/30/2009

We may also offer the previously approved Policy shown above with our Adjustable Term Life Insurance Rider, R-2031-03/08, and Unisex Endorsement, E-2041-03/08, in Norris situations. These forms were approved by your department on 02/05/2008 under SERFF Tracking Number DENV-125257771. I am including a revised Actuarial Memorandum that includes information about the use of this Rider and the Unisex Endorsement with the Policy.

Unless otherwise informed, we reserve the right to alter the layout of the enclosed form, including sequential ordering of the sections, color, and type font and size, and make any changes necessary to correct typographical errors or to comply with your state requirements, but we will only do so if such changes are within the allowable parameters or

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requirements set forth in your statutes.

To the best of our knowledge, the form complies with the laws and regulations of the insurance department of your state.

Sincerely,

Wendy Paquin, FLMI, CLU  
 Senior Contract Analyst  
 (612) 342-3595  
 (612) 342-7531 (fax)  
 wendy.paquin@us.ing.com

## Company and Contact

### Filing Contact Information

Wendy Paquin, wendy.paquin@us.ing.com  
 20 Washington Ave South 612-342-3595 [Phone]  
 Minneapolis, MN 55401 612-342-7531 [FAX]

### Filing Company Information

Security Life of Denver Insurance Company	CoCode: 68713	State of Domicile: Colorado
1290 Broadway	Group Code: 229	Company Type: Life Insurance
Denver, CO 80203-5699	Group Name:	State ID Number:
(303) 860-2348 ext. [Phone]	FEIN Number: 84-0499703	

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## Filing Fees

Fee Required?	Yes
Fee Amount:	\$20.00
Retaliatory?	No
Fee Explanation:	one rider x \$20 per rider = \$20
Per Company:	No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Security Life of Denver Insurance Company	\$20.00	05/10/2010	36367453

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Security Life of Denver Insurance Company \$30.00 05/11/2010 36402072

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## Correspondence Summary

### Dispositions

Status	Created By	Created On	Date Submitted
Approved-Closed	Linda Bird	05/12/2010	05/12/2010

### 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	05/11/2010	05/11/2010	Wendy Paquin	05/11/2010	05/11/2010



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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		Yes
<b>Supporting Document</b>	Application		No
<b>Supporting Document</b>	Health - Actuarial Justification		No
<b>Supporting Document</b>	Outline of Coverage		No
<b>Supporting Document</b>	Actuarial Memorandum		No
<b>Supporting Document</b>	Sample Schedule Pages		Yes
<b>Form</b>	Waiver of Surrender Charge Rider		Yes



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## Response Letter

Response Letter Status Submitted to State  
Response Letter Date 05/11/2010  
Submitted Date 05/11/2010

Dear Linda Bird,

### Comments:

I am responding to your May 11 Objection Letter.

### Response 1

Comments: As you requested, I am submitting the additional filing fee of \$30 via EFT.

### Related Objection 1

Comment:

Regulation 57 was revised effective January 1, 2010, the filing fee is now \$50.00 per form. We will hold your filing in a pending status until the additional \$30.00 is received.

### Changed Items:

No Supporting Documents changed.

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

If you have any questions, please let me know.

Sincerely,

EDS EDSSupport, Jackie Williams, Laura Sampair, Terry Stumpf, Wendy Paquin

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## Form Schedule

### Lead Form Number:

Schedule Item Status	Form Number	Form Type Form Name	Action	Action Specific Data	Readability	Attachment
	R1376-07/10	Policy/Cont Waiver of Surrender ract/Fratern Charge Rider al Certificate: Amendmen t, Insert Page, Endorseme nt or Rider	Initial		50.000	R1376 Basic.pdf

## WAIVER OF SURRENDER CHARGE RIDER

This Waiver of Surrender Charge Rider (this "Rider") is part of the policy to which it is attached (your "Policy"), provided it is listed in the [Additional Benefits and Riders] Schedule of your Policy. It is effective on the Policy Date, may not be added after your Policy is issued, and may not be terminated except as provided herein. Unless expressly changed by this Rider, the terms and conditions of your Policy remain the same and apply to this Rider. The terms used in this Rider have the same meaning as in your Policy.

### BENEFITS AND CONDITIONS

If we receive a request to fully surrender your Policy, we will waive a specified percentage of the surrender charge to be subtracted from your Policy's Account Value, provided that the surrender is not part of an exchange to another policy. The percentage of the surrender charge to be waived is specified in the [Additional Benefits and Riders] Schedule of your Policy.

We will not waive any surrender charges under the terms of this Rider if the surrender charges are a result of any of the following:

- a. If your Policy is surrendered during the Grace Period;
- b. If your Policy lapses;
- c. If your Policy's Stated Death Benefit is decreased;
- d. If you take a partial withdrawal that reduces your Policy's Stated Death Benefit; or
- e. If the ownership of your Policy is changed, including any change in beneficial ownership.

This Rider does not change the definition of Surrender Value in your Policy, and amounts available under your Policy for loans or partial withdrawals will continue to be calculated as if the surrender charges are not waived under this Rider.

### COST

There is an additional charge for this Rider, and it is included in the Administrative Charge per \$1,000.00 of Stated Death Benefit as shown in the [Guaranteed Maximum Policy Charges] Schedule of your Policy. This additional charge is guaranteed not to continue past the 20<sup>th</sup> Segment year, which may be after the surrender charge period has expired.

### TERMINATION

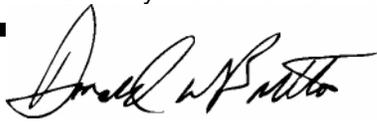
This Rider will terminate on the earliest of the following:

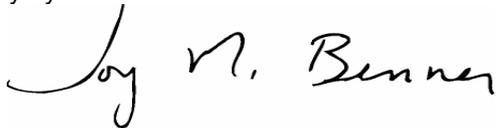
- a. The date your Policy expires or terminates for any reason; or
- b. The policy anniversary nearest the Insured's Attained Age 121.

### REINSTATEMENT AND INCONTESTABILITY

If we reinstate your Policy under your Policy's Reinstatement provision, we may reinstate this Rider if it was in effect when your Policy terminated. After this Rider has been in force for 2 years from the Policy Date, we will not contest it, except for nonpayment of the additional charge for this Rider.

Signed for Security Life of Denver Life Insurance Company by:

  
Donald W. Britton  
President

  
Joy M. Benner  
Secretary

**SECURITY LIFE OF DENVER INSURANCE COMPANY**  
Home Office: Denver, CO  
ING Customer Service Center: P.O. Box 5065, Minot, ND 58702 – 5065  
Toll Free Number: 1-877-253-5050

<i>SERFF Tracking Number:</i>	<i>INGD-126547937</i>	<i>State:</i>	<i>Arkansas</i>
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<i>Company Tracking Number:</i>	<i>R1376</i>		
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## Supporting Document Schedules

		<b>Item Status:</b>	<b>Status Date:</b>
<b>Satisfied - Item:</b>	Flesch Certification		
<b>Comments:</b>			
<b>Attachments:</b>			
	Flesch Readability Certification.pdf		
	AR Certification Reg 19 and 49.pdf		
		<b>Item Status:</b>	<b>Status Date:</b>
<b>Bypassed - Item:</b>	Application		
<b>Bypass Reason:</b>	Not applicable for this rider filing.		
<b>Comments:</b>			
		<b>Item Status:</b>	<b>Status Date:</b>
<b>Bypassed - Item:</b>	Outline of Coverage		
<b>Bypass Reason:</b>	Not applicable.		
<b>Comments:</b>			
		<b>Item Status:</b>	<b>Status Date:</b>
<b>Satisfied - Item:</b>	Sample Schedule Pages		
<b>Comments:</b>			
<b>Attachment:</b>			
	1180 Sample Schedule Pages for R1376 WSC Rider.pdf		

**SECURITY LIFE OF DENVER INSURANCE COMPANY  
Denver, Colorado**

**FLESCH READABILITY CERTIFICATE**

I certify that the Certificate form included in this submission has been printed in not less than ten point type.

The style, arrangement and overall appearance of the form gives no undue prominence to any portion of the text of the form.

The section titles are captioned in bold face type. The layout and spacing of the form separate the paragraphs from each other and from the border of the paper.

Unnecessarily long, complicated or obscure words, sentences, paragraphs or constructions are not used in this form.

**Flesch Scale Reading Ease Score**

I have supervised the computation of the Flesch scale reading ease score of this form, using the complete text of the form except for headings, indexes and tabular material, and the scores are listed below.

**Form Number**

R1376-07/10

**Flesch Reading Ease Scores**

50.0

Signed



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Terry Stumpf  
Assistant Secretary

Date:

May 1, 2010

**ARKANSAS  
CERTIFICATION**

RE: R1376-07/10 Waiver of Surrender Charge Rider

As an officer of Security Life of Denver Insurance Company, I certify that this submission meet the provisions of Regulation 19 (unfair sex discrimination in the sale of life insurance), Regulation 49 (guaranty association notice) and all applicable requirements of the Arkansas Insurance Department.

**SECURITY LIFE OF DENVER INSURANCE COMPANY**

By:   
\_\_\_\_\_  
Terry Stumpf, Assistant Secretary

Date: 05/10/2010

**SCHEDULE (CONTINUED)**

**ADDITIONAL BENEFITS AND RIDERS**

(For charges, if any, see the Rider Charges section. For details on each rider, see your rider.)

[WAIVER OF SURRENDER CHARGE RIDER

Percentage of Surrender Charge eligible for waiver]

[XX.XX%]

Unless otherwise stated above the risk class, rating factor and/or flat extra amount, if any, is the same as Segment #1.

The information provided above is for each rider on its effective date. Some rider death benefits may change at the beginning of each policy year. For details, see your rider and applicable Schedules, if any.

(Print for FUW version)

**SCHEDULE (CONTINUED)**

**GUARANTEED MAXIMUM POLICY CHARGES**

- |    |  |  |                            |
|----|--|--|----------------------------|
| a. | <b>Guaranteed Maximum Premium Expense Charge</b><br>(of each premium)                      | 15.00%   |                            |
| b. | <b>Guaranteed Maximum Monthly Charges</b>  |  |                            |
| 1. | Cost of Insurance Charge   | See the Policy Table of Guaranteed Rates Schedule            |                            |
| 2. | Policy Charge  | \$30.00  |                            |
| 3. | Administrative Charge per \$1,000.00 of Stated Death Benefit                               | <b>Segment #1</b><br>Segment years 1-20<br>Segment years 21+ | [\$0.30600]<br>[\$0.00100] |
| c. | <b>Guaranteed Maximum Transaction Charges</b>  |  |                            |
| 1. | Partial Withdrawal Service Fee<br>(for each partial withdrawal)                            | \$10.00  |                            |
| 2. | Excess Policy Illustration Fee<br>(for each illustration after the first in a policy year) | \$25.00  |                            |

(Print for GI version)

**SCHEDULE (CONTINUED)**

**GUARANTEED MAXIMUM POLICY CHARGES**

d.	<b>Guaranteed Maximum Premium Expense Charge</b> (of each premium)	15.00%	
e.	<b>Guaranteed Maximum Monthly Charges</b>		
3.	Cost of Insurance Charge	See the Policy Table of Guaranteed Rates Schedule	
4.	Policy Charge	\$30.00	
5.	Administrative Charge per \$1,000.00 of Stated Death Benefit	<b>Segment #1</b> Segment years 1-20 Segment years 21+	[\$0.29660] [\$0.00100]
f.	<b>Guaranteed Maximum Transaction Charges</b>		
6.	Partial Withdrawal Service Fee (for each partial withdrawal)	\$10.00	
7.	Excess Policy Illustration Fee (for each illustration after the first in a policy year)	\$25.00	

**SCHEDULE (CONTINUED)**

**GUARANTEED MAXIMUM MONTHLY RIDER CHARGES**

[WAIVER OF SURRENDER CHARGE RIDER]

[Included in the Administrative Charge per \$1,000.00 of Stated Death Benefit; see the Guaranteed Maximum Policy Charges Schedule]