

SERFF Tracking Number: INGD-126615172 State: Arkansas  
Filing Company: ING Life Insurance and Annuity Company State Tracking Number: 45931  
Company Tracking Number: IU-RA-4029  
TOI: A03I Individual Annuities - Deferred Variable Sub-TOI: A03I.004 Modified Single Premium  
Product Name: Annuity Commencement Date Endorsement  
Project Name/Number: IU-RA-4029/IU-RA-4029

## Filing at a Glance

Company: ING Life Insurance and Annuity Company

Product Name: Annuity Commencement Date SERFF Tr Num: INGD-126615172 State: Arkansas

Endorsement

TOI: A03I Individual Annuities - Deferred Variable SERFF Status: Closed-Approved-Closed State Tr Num: 45931

Sub-TOI: A03I.004 Modified Single Premium Co Tr Num: IU-RA-4029 State Status: Approved-Closed  
Filing Type: Form Reviewer(s): Linda Bird

Authors: Karen Flieck, Alicia Disposition Date: 06/17/2010

Gemelli, Susan Holloway, Christine

Runkle-DiFonzo

Date Submitted: 06/14/2010 Disposition Status: Approved-Closed

Implementation Date Requested: On Approval

State Filing Description:

Implementation Date:

## General Information

Project Name: IU-RA-4029

Project Number: IU-RA-4029

Requested Filing Mode: Review & Approval

Status of Filing in Domicile: Pending

Date Approved in Domicile:

Domicile Status Comments: CT is our state of domicile

Explanation for Combination/Other:

Market Type: Individual

Submission Type: New Submission

Group Market Size:

Overall Rate Impact:

Group Market Type:

Filing Status Changed: 06/17/2010

Explanation for Other Group Market Type:

State Status Changed: 06/17/2010

Deemer Date:

Created By: Christine Runkle-DiFonzo

Submitted By: Christine Runkle-DiFonzo

Corresponding Filing Tracking Number:

Filing Description:

The Annuity Commencement Date Endorsement IU-RA-4029 is being submitted for your review and approval. The form is new and is not intended to revise or replace any form previously filed with, or approved for use by, your Department. The form does not contain any unusual or possibly controversial items from normal company or industry standards.

Endorsement IU-RA-4029 will be attached to all new issues of the individual Modified Single Premium Deferred Variable

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Annuity Contract IU-IA-4017, approved by your Department on 10/27/09, SERFF Tracking No. INGD-126217343. The endorsement increases the maximum and default annuity commencement date to January 1st after the annuitant turns 90. There is no actuarial memorandum associated with this filing.

The target market for the Company's annuity products is the general public. The issue age range for the endorsement will follow the issue ages available on the contract to which it is attached.

The officer's signature is enclosed in brackets to indicate variability. We reserve the right to make changes to the officer's signature to reflect current company operations. In addition, changes in printing technology may periodically alter slightly form format. We reserve the right to make such changes without re-filing. Any such change, when made, will comply with applicable state requirements.

As the endorsement is attached to and made a part of a variable annuity that is filed and registered with the Securities Exchange Commission (SEC), it is exempt from any state readability requirements. The form is being filed concurrently in Connecticut, our state of domicile.

Your review and approval of this submission will be greatly appreciated. If there are any questions or comments regarding this filing, please do not hesitate to contact me at 1-800-325-3792 extension 4253977, directly at 610-425-3977, or via e-mail at 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 Life Insurance and Annuity Company CoCode: 86509 State of Domicile: Connecticut  
One Orange Way Group Code: 229 Company Type:  
Windsor, CT 06095 Group Name: State ID Number:  
(800) 654-8065 ext. [Phone] FEIN Number: 71-0294708

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## Filing Fees

Fee Required? Yes  
Fee Amount: \$50.00

SERFF Tracking Number: *INGD-126615172* State: *Arkansas*  
Filing Company: *ING Life Insurance and Annuity Company* State Tracking Number: *45931*  
Company Tracking Number: *IU-RA-4029*  
TOI: *A031 Individual Annuities - Deferred Variable* Sub-TOI: *A031.004 Modified Single Premium*  
Product Name: *Annuity Commencement Date Endorsement*  
Project Name/Number: *IU-RA-4029/IU-RA-4029*  
Retaliatory? **No**  
Fee Explanation: **form fee @ \$50.00**  
Per Company: **No**

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
ING Life Insurance and Annuity Company	\$50.00	06/14/2010	37193758

SERFF Tracking Number: *INGD-126615172* State: *Arkansas*  
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TOI: *A03I Individual Annuities - Deferred Variable* Sub-TOI: *A03I.004 Modified Single Premium*  
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## Correspondence Summary

### Dispositions

<b>Status</b>	<b>Created By</b>	<b>Created On</b>	<b>Date Submitted</b>
Approved-Closed	Linda Bird	06/17/2010	06/17/2010

*SERFF Tracking Number:*      *INGD-126615172*                      *State:*                      *Arkansas*  
*Filing Company:*              *ING Life Insurance and Annuity Company*      *State Tracking Number:*      *45931*  
*Company Tracking Number:*      *IU-RA-4029*  
*TOI:*                      *A031 Individual Annuities - Deferred Variable*      *Sub-TOI:*                      *A031.004 Modified Single Premium*  
*Product Name:*              *Annuity Commencement Date Endorsement*  
*Project Name/Number:*      *IU-RA-4029/IU-RA-4029*

## **Disposition**

Disposition Date: 06/17/2010

Implementation Date:

Status: Approved-Closed

Comment:

Rate data does NOT apply to filing.



SERFF Tracking Number: *INGD-126615172* State: *Arkansas*  
 Filing Company: *ING Life Insurance and Annuity Company* State Tracking Number: *45931*  
 Company Tracking Number: *IU-RA-4029*  
 TOI: *A031 Individual Annuities - Deferred Variable* Sub-TOI: *A031.004 Modified Single Premium*  
 Product Name: *Annuity Commencement Date Endorsement*  
 Project Name/Number: *IU-RA-4029/IU-RA-4029*

## Form Schedule

**Lead Form Number: IU-RA-4029**

Schedule Item Status	Form Number	Form Type Form Name	Action	Action Specific Data	Readability	Attachment
	IU-RA-4029	Policy/Cont Annuity ract/Fratern Commencement al Date Endorsement Certificate: Amendmen t, Insert Page, Endorseme nt or Rider	Initial		0.000	IU-RA-4029.pdf

# ING Life Insurance and Annuity Company

## ANNUITY COMMENCEMENT DATE ENDORSEMENT

The Contract to which this Annuity Commencement Date 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 the last paragraph of **The Annuitant** provision found in Section 3.3 of the Contract.

If the Annuitant is not the Owner and the Annuitant dies prior to the Annuity Commencement Date (and no Contingent Annuitant is named) and the Owner is a natural person, we will treat you or, if there are Joint Owners, the youngest Owner, as the Annuitant if such youngest Owner has not attained age 90 as of the date of the Annuitant's death. Otherwise you must name an individual as the Annuitant who has not attained age 90.

The following provision replaces the last paragraph of the Spousal Beneficiaries provision found in Section 6.3 of the Contract.

If the deceased Owner's spouse does not choose to continue the Contract (or, if continued, upon the death of the deceased Owner's spouse), the Minimum Guaranteed Withdrawal Benefit will terminate and the Death Benefit will be distributed as stated below for non-spousal Beneficiaries. If the deceased Owner's spouse has attained age 90 on the date of the Owner's death, the deceased Owner's spouse may not choose to continue the Contract and the Death Benefit will be distributed as stated below for non-spousal Beneficiaries.

The following provision replaces the entire Selecting an Annuity Commencement Date provision found in Section 6.4 of the Contract.

You select the Annuity Commencement Date. The Annuity Commencement Date may be any date following the fifth Contract Anniversary but not later than January 1st on or next following the oldest Annuitant's 90<sup>th</sup> birthday, unless we agree to a later date. You may select an Annuity Commencement Date by providing Notice to Us at least thirty days in advance of the date you select. If you do not select an Annuity Commencement Date, the Annuity Commencement Date will be January 1st on or next following the oldest Annuitant's 90<sup>th</sup> birthday.

The following provision replaces the entire The Annuity Plans provision found in Section 6.4 of the Contract.

- (1) **Payments for a Period Certain**  
Annuity Payments are paid in equal installments for a fixed number of years as shown in Table A below. The number of years cannot be less than ten or, subject to any limitations under applicable law, more than thirty.
- (2) **Payments for Life with Period Certain**  
Annuity Payments are paid for a fixed number of years and as long thereafter as the Annuitant is living as shown in Table B below. However, the number of years cannot be less than ten or more than thirty unless otherwise required by applicable law.
- (3) **Life Only Payments**  
Annuity Payments are paid for as long as the Annuitant is living as shown in Table B below.
- (4) **Joint and Last Survivor Life Payments**  
Annuity Payments are paid for as long as either of two Annuitants is living as shown in Table C below.
- (5) **Payments for Life with Surrender Right and Death Benefit**  
If Annuity Payments have not commenced by the latest Annuity Commencement Date permitted under the Contract, you may elect, in lieu of any other Annuity Plan, Annuity Payments that will begin on or about January 25th following the Annuity Commencement Date and be paid for as long as the Annuitant is living. Annuity Payments under this Annuity Plan will equal, on an annual calendar year basis after the Annuity Commencement Date, the greater of:
  - (a) The MAW and
  - (b) The Accumulation Value as of the end of the prior calendar year, divided by the life expectancy of the Annuitant, based on the Annuitant's age, as determined under the Single Life Table under Treasury Regulation Section 1.401(a)(9)-9 as shown in Table D.

Under this option, the Accumulation Value will remain allocated among the available variable sub-accounts as you direct. The Owner may Surrender the Contract at any time but Withdrawals, Additional Premiums, or subsequent election of a different Annuity Plan will not be permitted.

Upon the death of the Annuitant, if the Contract is not in Lifetime Automatic Periodic Benefit Status the Beneficiary will be entitled to receive the Death Benefit, as described in Section 6.3, according to one of the following:

- (a) In a lump sum on or before the end of the calendar year in which the Annuitant's death occurs; or
- (b) Periodic payments, in the same frequency and at least as rapidly as under this Annuity Plan at the time of death, equal to, on an annual basis as determined as of the end of the prior year immediately preceding the Contract Year in which the payments will be made, the Accumulation Value (increased by the difference between the Accumulation Value and, if greater, the Standard Death Benefit Base upon receipt of due Proof of Death) divided by the remaining life expectancy of the Annuitant at the time of death (or the life expectancy of the Beneficiary at the time of the Annuitant's death if shorter) as determined under the Single Life Table under Treasury Regulation Section 1.401(a)(9)-9. If the Accumulation Value has been reduced to zero upon receipt of Proof of Death, the Death Benefit will equal the Standard Death Benefit Base and this amount will be allocated to the Specially Designated Variable Sub-account. On each December 31st following the first periodic payment under this distribution option, the periodic payment will be calculated using the remaining Accumulation Value and the life expectancy factor used in calculating the prior payment to the Beneficiary reduced by one. At any time after the election of this periodic payment option, the Beneficiary may allocate all or a portion of the Accumulation Value from the Specially Designated Variable Sub-account to the available variable sub-accounts.

Tables B and C in the Annuity Plan Tables provision found in Section 6.4 of the Contract will be replaced by the following.

Table B: Monthly Life Payments (Single Annuitant)

Annuitant's Age	Life Only	Life with 10 Year Period Certain	Life with 20 Year Period Certain
	Male/Female	Male/Female	Male/Female
50	\$2.98/2.75	\$2.97/2.74	\$2.89/2.70
55	3.37/3.08	3.34/3.07	3.20/2.99
60	3.89/3.52	3.82/3.49	3.55/3.34
65	4.58/4.11	4.44/4.04	3.91/3.72
70	5.54/4.93	5.20/4.75	4.22/4.10
75	6.87/6.12	6.09/5.67	4.43/4.38
80	8.72/7.88	7.00/6.71	4.54/4.53
85	11.30/10.50	7.79/7.65	4.58/4.58
90	14.85/14.23	8.34/8.28	4.59/4.59

Table C: Monthly Joint and Last Survivor Life Payments (Joint Annuitants)

Female Age	Male Age								
	50	55	60	65	70	75	80	85	90
50	\$2.47	\$2.55	\$2.62	\$2.67	\$2.70	\$2.72	\$2.73	\$2.74	\$2.74
55	2.60	2.73	2.85	2.93	2.99	3.03	3.05	3.06	3.07
60	2.71	2.90	3.08	3.22	3.33	3.41	3.46	3.48	3.50
65	2.81	3.05	3.30	3.53	3.73	3.87	3.97	4.03	4.07
70	2.87	3.16	3.49	3.83	4.15	4.41	4.61	4.75	4.83
75	2.92	3.25	3.64	4.09	4.56	5.01	5.39	5.67	5.86
80	2.95	3.30	3.74	4.28	4.91	5.58	6.23	6.79	7.20
85	2.96	3.34	3.81	4.42	5.17	6.06	7.03	7.98	8.80
90	2.97	3.54	3.84	4.49	5.33	6.39	7.66	9.05	10.41

Signed:

[  ]  
Secretary

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## Supporting Document Schedules

	<b>Item Status:</b>	<b>Status Date:</b>
<b>Satisfied - Item:</b> Flesch Certification		
<b>Comments:</b>		
Attached is Rule & Regulation 19 Certification. The other compliance certification does not apply as this is an endorsement filing. This endorsement will be attached to new issues of previously approved contract IU-IA-4017 (see filing description for details of the approval date and Serff Tracking no. which all appropriate certifications were submitted with the contract)		
Flesch Certification not required - variability annuity, exempt from readability.		
<b>Attachment:</b>		
AR Rule 19 Cert.pdf		

	<b>Item Status:</b>	<b>Status Date:</b>
<b>Bypassed - Item:</b> Application		
<b>Bypass Reason:</b> Not required. This is an endorsement filing. Please refer to the filing description for details of this filing.		
<b>Comments:</b>		

**ARKANSAS  
POLICY FORM CERTIFICATION**

Form Number: IU-RA-4029

Form Title: Modified Single Premium Deferred Variable Annuity Contract

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

June 14, 2010

Date