

SERFF Tracking Number: INGD-126757051 State: Arkansas
Filing Company: ING Life Insurance and Annuity Company State Tracking Number: 46645
Company Tracking Number: IU-RA-3099 ET AL
TOI: A10 Annuities - Other Sub-TOI: A10.000 Annuities - Other
Product Name: IU-RA-3099 et al. ACD/Maturity Date Endorsements
Project Name/Number: IU-RA-3099 et al. ACD/Maturity Date Endorsements/IU-RA-3099 et al.

Filing at a Glance

Company: ING Life Insurance and Annuity Company

Product Name: IU-RA-3099 et al. ACD/Maturity SERFF Tr Num: INGD-126757051 State: Arkansas

Date Endorsements

TOI: A10 Annuities - Other

SERFF Status: Closed-Approved-
Closed State Tr Num: 46645

Sub-TOI: A10.000 Annuities - Other

Co Tr Num: IU-RA-3099 ET AL State Status: Approved-Closed

Filing Type: Form

Reviewer(s): Linda Bird

Authors: Karen Flieck, Alicia
Disposition Date: 08/31/2010

Gemelli, Susan Holloway, Christine

Runkle-DiFonzo, Patricia Smith

Date Submitted: 08/30/2010

Disposition Status: Approved-
Closed

Implementation Date Requested: 12/31/2010

Implementation Date:

State Filing Description:

General Information

Project Name: IU-RA-3099 et al. ACD/Maturity Date Endorsements

Status of Filing in Domicile: Pending

Project Number: IU-RA-3099 et al.

Date Approved in Domicile:

Requested Filing Mode: Review & Approval

Domicile Status Comments: The submitted
endorsements are being filed concurrently in
Connecticut, 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: 08/31/2010

Explanation for Other Group Market Type:

State Status Changed: 08/31/2010

Deemer Date:

Created By: Alicia Gemelli

Submitted By: Alicia Gemelli

Corresponding Filing Tracking Number:

Filing Description:

Honorable Jay Bradford, Commissioner

Arkansas Insurance Department

1200 West Third Street

Little Rock, Arkansas 72201-1904

SERFF Tracking Number: INGD-126757051 State: Arkansas
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ATTN: Life & Health Division

RE: ING Life Insurance and Annuity Company
NAIC No.: 229-86509 FEIN No.: 71-0294708
Forms: IU-RA-3099 Annuity Commencement Date Endorsement
IU-RA-3100 Maturity Date Endorsement

Dear Sir/Madam:

Enclosed please find the above-referenced forms for your review and approval. These forms are new and are not intended to revise or replace any forms previously filed with, or approved for use by, your Department. The forms do not contain any unusual or possibly controversial items from normal company or industry standards.

Annuity Commencement Date Endorsement, form no. IU-RA-3099, will be attached to all new issues of individual Single Premium Deferred Modified Guaranteed Annuity Contract, form no. IU-IA-3096(AR), approved by your Department on September 28, 2009 under SERFF Tracking No. INGD-126248036, State Tracking No. 43593. The endorsement increases the maximum and default annuity commencement date to the contract anniversary on or next following the oldest annuitant's 90th birthday.

Maturity Date Endorsement, form no. IU-RA-3100, will be attached to all new issues of individual Modified Single Premium Deferred Annuity Contract, form nos. IU-IA-3089 and IU-IA-3090, approved by your Department on November 4, 2009 under SERFF Tracking No. INGD-126256913, State Tracking No. 43961. The endorsement increases the maturity date to the contract anniversary on or next following the oldest annuitant's attainment of age 90.

General Information:

Actuarial materials – An actuarial memorandum is not enclosed as the change in annuity commencement date or maturity date does not affect contract values. While use of the Maturity Date Endorsement with contract forms IU-IA-3089 and IU-IA-3090 increases the maximum issue age to age 80, the nonforfeiture demonstrations in the base contracts still apply.

Variability – The customer service address and the officer's signature in the endorsements are enclosed in brackets to indicate variability. We reserve the right to modify the company address and officer 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 refiling. Any such changes, when made, will comply with applicable state requirements.

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Marketing – The target market for the Company’s annuity products is the general public. The issue age range for contract forms IU-IA-3089 and IU-IA-3090 with the Maturity Date Endorsement will be age 0-80. With the Annuity Commencement Date Endorsement, the issue age range for contract form IU-IA-3096(AR) remains 0-80.

Readability – As the endorsements are attached to and made a part of contract forms registered with the Securities and Exchange Commission (SEC), and, as such, must conform to the requirements of that regulatory agency, they are exempt from any state readability requirements.

Domicile – The endorsements are being filed concurrently in Connecticut, our state of domicile.

We have reviewed the enclosed forms and certify that the forms submitted meet the provisions of Rule 19 as well as all applicable requirements of the Arkansas Insurance Department

Thank you for your assistance with this filing. Your review and approval of this submission will be greatly appreciated. Should you have questions or require additional information, please do not hesitate to contact me at the telephone numbers or email address provided below.

Sincerely,

Alicia L. Gemelli
Contract Analyst
(800) 325-3792 ext. 4253850
(610) 425-3850 (direct)
alicia.gemelli@us.ing.com

Company and Contact

Filing Contact Information

Alicia Gemelli, Contract Analyst
1475 Dunwoody Drive
West Chester, PA 19380
alicia.gemelli@us.ing.com
800-325-3792 [Phone] 4253850
[Ext]
610-425-3520 [FAX]

Filing Company Information

ING Life Insurance and Annuity Company
One Orange Way
Windsor, CT 06095
(800) 654-8065 ext. [Phone]

CoCode: 86509
Group Code: 229
Group Name:
FEIN Number: 71-0294708
State of Domicile: Connecticut
Company Type:
State ID Number:

SERFF Tracking Number: *INGD-126757051* State: *Arkansas*
Filing Company: *ING Life Insurance and Annuity Company* State Tracking Number: *46645*
Company Tracking Number: *IU-RA-3099 ET AL*
TOI: *A10 Annuities - Other* Sub-TOI: *A10.000 Annuities - Other*
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Project Name/Number: *IU-RA-3099 et al. ACD/Maturity Date Endorsements/IU-RA-3099 et al.*

Filing Fees

Fee Required? Yes
Fee Amount: \$100.00
Retaliatory? No
Fee Explanation: \$50.00 per annuity endorsement form x 2 forms submitted = \$100.00.
Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
ING Life Insurance and Annuity Company	\$100.00	08/30/2010	39101031

SERFF Tracking Number: *INGD-126757051* State: *Arkansas*
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Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved-Closed	Linda Bird	08/31/2010	08/31/2010

SERFF Tracking Number: *INGD-126757051* *State:* *Arkansas*
Filing Company: *ING Life Insurance and Annuity Company* *State Tracking Number:* *46645*
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Project Name/Number: *IU-RA-3099 et al. ACD/Maturity Date Endorsements/IU-RA-3099 et al.*

Disposition

Disposition Date: 08/31/2010

Implementation Date:

Status: Approved-Closed

Comment:

Rate data does NOT apply to filing.

SERFF Tracking Number: *INGD-126757051* State: *Arkansas*
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 Project Name/Number: *IU-RA-3099 et al. ACD/Maturity Date Endorsements/IU-RA-3099 et al.*

Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Flesch Certification		No
Supporting Document	Application		No
Supporting Document	Life & Annuity - Actuarial Memo		No
Supporting Document	Arkansas Rule 19 Certification		Yes
Form	Annuity Commencement Date		Yes
	Endorsement		
Form	Maturity Date Endorsement		Yes

SERFF Tracking Number: *INGD-126757051* State: *Arkansas*
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Form Schedule

Lead Form Number: IU-RA-3099

Schedule Item Status	Form Number	Form Type Form Name	Action	Action Specific Data	Readability	Attachment
	IU-RA-3099	Policy/Cont Annuity ract/Fratern Commencement al Date Endorsement Certificate: Amendmen t, Insert Page, Endorseme nt or Rider	Initial		0.000	IU-RA-3099.pdf
	IU-RA-3100	Policy/Cont Maturity Date ract/Fratern Endorsement al Certificate: Amendmen t, Insert Page, Endorseme nt or Rider	Initial		0.000	IU-RA-3100.pdf

ING Life Insurance and Annuity Company

[P.O. BOX 10450, 909 LOCUST STREET, DES MOINES, IOWA 50306-0450]

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 Annuitants are not the Owners and all Annuitants die 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 an 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 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.

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 first Contract Anniversary but not later than the Contract Anniversary on or next following the oldest Annuitant's 90th 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 the Contract Anniversary on or next following the oldest Annuitant's 90th birthday.

Tables B and C in the Annuity Plan Tables provision found in Section 6.4 of the Contract are 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

All other provisions of the Contract remain unchanged.

Signed:

[]
 Secretary

ING Life Insurance and Annuity Company

[P.O. BOX 10450, 909 LOCUST STREET, DES MOINES, IOWA 50306-0450]

MATURITY DATE ENDORSEMENT

The Contract to which this Maturity 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 definition replaces the definition of **Maturity Date** found in Section 2 of the Contract.

Maturity Date means the date shown on the first page of this Contract. As long as this Contract is still in force on the Maturity Date, the Proceeds are used to determine the amount paid under the Annuity Plan chosen. The Maturity Date shall be the Contract Anniversary on or next following the oldest Annuitant's attainment of age 90.

The following provision replaces the last paragraph of **The Annuitant** provision found in Section 3.3 of the Contract.

If the Annuitants are not the Owners and all Annuitants die prior to the Maturity 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 an Annuitant who has not attained age 90.

The following provision replaces the last paragraph of the Spousal Beneficiaries provision found in Section 7.2 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 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.

Tables B and C in the Annuity Plan Tables provision found in Section 7.3 of the Contract are replaced by the following.

Table B: Monthly Life Payments (Single Annuitant)

Age of Payee	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

All other provisions of the Contract remain unchanged.

Signed:

[]
Secretary

SERFF Tracking Number: *INGD-126757051* State: *Arkansas*
Filing Company: *ING Life Insurance and Annuity Company* State Tracking Number: *46645*
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Supporting Document Schedules

Item Status:

Status

Date:

Satisfied - Item: Arkansas Rule 19 Certification

Comments:

A certification of compliance with Arkansas Rule 19 for the submitted endorsements is attached.

Attachment:

AR Rule 19 Cert.pdf

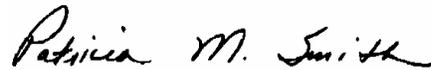
**ARKANSAS
POLICY FORM CERTIFICATION
ING LIFE INSURANCE AND ANNUITY COMPANY**

Form Number: IU-RA-3099, IU-RA-3100

Form Title: Annuity Commencement Date Endorsement, Maturity Date 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:



Patricia M. Smith
Assistant Secretary

August 30, 2010
Date