

SERFF Tracking Number: AMEQ-127687430 State: Arkansas  
Filing Company: Eagle Life Insurance Company State Tracking Number: 49975  
Company Tracking Number: VARIABILITY CHANGE  
TOI: A02I Individual Annuities- Deferred Non- Sub-TOI: A02I.002 Flexible Premium  
Variable  
Product Name: VARIABILITY CHANGE  
Project Name/Number: VARIABILITY CHANGE/VARIABILITY CHANGE

## Filing at a Glance

Company: Eagle Life Insurance Company

Product Name: VARIABILITY CHANGE

TOI: A02I Individual Annuities- Deferred Non-  
Variable

Sub-TOI: A02I.002 Flexible Premium

Filing Type: Form

SERFF Tr Num: AMEQ-127687430 State: Arkansas

SERFF Status: Closed-Approved- State Tr Num: 49975  
Closed

Co Tr Num: VARIABILITY State Status: Approved-Closed  
CHANGE

Authors: Terri Parker, Kathleen  
Underwood, Tiffany Meuer, Dave  
Milligan, Troy Christensen, Janine  
Plettner-Glodt, Erin Wagner

Date Submitted: 10/07/2011

Reviewer(s): Linda Bird

Disposition Date: 10/13/2011

Disposition Status: Approved-  
Closed

Implementation Date Requested: On Approval

State Filing Description:

Implementation Date:

## General Information

Project Name: VARIABILITY CHANGE

Project Number: VARIABILITY CHANGE

Requested Filing Mode: Review & Approval

Explanation for Combination/Other:

Submission Type: New Submission

Overall Rate Impact:

Status of Filing in Domicile: Pending

Date Approved in Domicile:

Domicile Status Comments:

Market Type: Individual

Individual Market Type:

Filing Status Changed: 10/13/2011

State Status Changed: 10/13/2011

Created By: Tiffany Meuer

Corresponding Filing Tracking Number:

Deemer Date:

Submitted By: Tiffany Meuer

Filing Description:

NAIC #13183

FEIN 26-3218907

October 5, 2011

Re: Cap and Rate Minimum Changes Only

As a result of the current economic downturn we are seeking to adjust the previously approved Cap and

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Rate Minimums on any future policy contracts issued with Eagle Life Insurance Company. Any policies already issued will not be affected by these changes. Additionally, these changes do not affect the minimum cash values that were previously provided in the original filings.

We are requesting approval for changes on the following previously approved form filing and have provided a new Statement of Variability to the Supporting Document Tab in SERFF:

Form # INDEX-4-09R

Tracking #: AMEQ-126531820

Initial Interest Rate will range from 1% to unlimited. (Item #17)

Minimum Guaranteed Interest Rate (FV-MGIR) will range from 0.25% to 3%. (Item #18)

Initial Cap Rate for Annual Point to Point will range from 1% to unlimited. (Item #21)

Guaranteed Minimum Cap Rate will range from 0.50%-4%. (Item #22)

Initial MPT Cap Rate will range from 1% to unlimited. (Item #26)

MPT Guaranteed Minimum Monthly Cap Rate will range from 1-4%. (Item #27)

Sincerely,

Marla Lacey

Vice President, Chief Compliance Officer & General Counsel

## Company and Contact

### Filing Contact Information

Troy Christensen, AVP Compliance Counsel tchristensen@american-equity.com  
6000 Westown Pkwy 515-457-1863 [Phone]  
West Des Moines, IA 50266

### Filing Company Information

Eagle Life Insurance Company CoCode: 13183 State of Domicile: Iowa  
6000 Westown Pkwy Group Code: 2658 Company Type: Life  
West Des Moines, IA 50266 Group Name: State ID Number:  
(515) 273-3525 ext. [Phone] FEIN Number: 26-3218907

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## Filing Fees

Fee Required? Yes  
Fee Amount: \$50.00  
Retaliatory? No  
Fee Explanation:

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Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Eagle Life Insurance Company	\$50.00	10/07/2011	52581607

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## Correspondence Summary

### Dispositions

Status	Created By	Created On	Date Submitted
Approved- Closed	Linda Bird	10/13/2011	10/13/2011

### 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	10/11/2011	10/11/2011	Tiffany Meuer	10/13/2011	10/13/2011

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## Disposition

Disposition Date: 10/13/2011

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		Yes
Supporting Document	Life & Annuity - Acturial Memo		No
Supporting Document (revised)	COVER LETTER		Yes
Supporting Document	COVER LETTER	Replaced	Yes
Form (revised)	VARIABILITY CHANGE		Yes
Form	VARIABILITY CHANGE	Replaced	Yes

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## Objection Letter

Objection Letter Status Pending Industry Response  
Objection Letter Date 10/11/2011  
Submitted Date 10/11/2011  
Respond By Date 11/11/2011

Dear Troy Christensen,

This will acknowledge receipt of the captioned filing.

### Objection 1

Comment: Values that are not guaranteed for the life of the contract must have guaranteed maximum and minimum guaranteed values. The range from 1% to unlimited is not in compliance with Arkansas contract guidelines. The range "to unlimited" on the statement of variability will need to be revised in order to comply.

Item #21, #22, #26, and #27 on the cover letter and the Statement of Variability do not match.

A.C.A. 23-79-109(1)-(5) sets forth the procedure by which filings may be deemed approved upon the expiration of certain time periods with no affirmative action by the commissioner. If the commissioner determines that additional information is needed to make a decision regarding approval, such request for information will be made to the company. The filing will not be considered complete until said additional information is received. The time periods set forth in this statute will not begin to run until the filing is complete.

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 10/13/2011  
 Submitted Date 10/13/2011

Dear Linda Bird,

### Comments:

### Response 1

Comments: A revised statement of variability has been placed under the form schedule and updated numbered cover letter of our changes under the supporting document tab. Please let us know if you do have any further questions.

Thank you

### Related Objection 1

Comment:

Values that are not guaranteed for the life of the contract must have guaranteed maximum and minimum guaranteed values. The range from 1% to unlimited is not in compliance with Arkansas contract guidelines. The range "to unlimited" on the statement of variability will need to be revised in order to comply.

Item #21, #22, #26, and #27 on the cover letter and the Statement of Variability do not match.

### Changed Items:

#### Supporting Document Schedule Item Changes

Satisfied -Name: COVER LETTER

Comment:

#### Form Schedule Item Changes

Form Name	Form Number	Edition Date	Form Type	Action	Action Specific Data	Readability Score	Attach Document
VARIABILITY CHANGE	VARIABILITY CHANGE		Other	Other	VARIABILITY CHANGE		4-09R stmtofVariability1110



SERFF Tracking Number: AMEQ-127687430 State: Arkansas  
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## Form Schedule

Lead Form Number: VARIABILITY CHANGE

Schedule Item Status	Form Number	Form Type	Form Name	Action	Action Specific Data	Readability	Attachment
	VARIABILITY CHANGE	Other	VARIABILITY CHANGE	Other	Other Explanation: VARIABILITY CHANGE ONLY		4-09R stmtofVariability111013-AR.pdf

# STATEMENT OF VARIABILITY

## INDEX-4-09R

I certify only items within brackets on page 3, 3a and the signatures, address and phone number on page 1 are variable. They will vary as follows:

### Page 1

Signatures will change only when officers change.

Address and/or phone number will change only if We change locations.

### Page 3

Items 1 through 10 on Page 3 are self-explanatory based on the specifics of the applicant as provided in the application.

11. **Minimum Guaranteed Interest Rate:** MGIR is set at issue, based on the average of five-year Constant Maturity Treasury Rate for October of immediately preceding year, initially 2009, will change for new issues each January, and is guaranteed for the Guarantee Period. (1% - 3%) and applies to Minimum Guaranteed Surrender Value only.
12. **MVA Index:** Index to which MVA is currently linked. Would vary only if it becomes necessary to substitute a suitable alternative index approved by DOI of issue state.

**Surrender Charge Period and Percentage:** 3, 5, or 7 years, varies as chosen by applicant.

13. **Nonforfeiture Rate:** This rate is effective for all issues in 2010. New issues in 2011 and subsequent calendar years under this contract form will be based off the average of the October 5 Year CMT rate as of the previous year.
14. **DOI:** varies dependent upon state of delivery
15. **Phone Number:** varies dependent upon DOI

### Page 3a

#### Fixed Value Specifications

16. **Initial Premium:** Based on amount of Initial Premium and applicant's allocation of Initial Premium as shown on Application.
17. **Initial Interest Rate:** Range: 1% to 15%. At issue and guaranteed for the first Contract Year, applies to Fixed Value Initial Premium only.
18. **Minimum Guaranteed Interest Rate (FV-MGIR)** Range of 0.25% to 3% based on market conditions.

#### Annual Point to Point Value Specifications

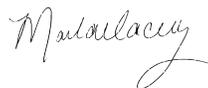
19. **Index:** Index to which these Index Credits are currently linked. Would vary only if it becomes necessary to substitute a suitable alternative index approved by DOI of issue state.
20. **Initial Premium:** Based on amount of Initial Premium and applicant's allocation of Initial Premium as shown on Application.
21. **Index on Contract Date:** At issue of each new contract, based on S&P 500 on the Contract Date.
22. **Initial Cap Rate:** 1% to 20% based on market conditions.
23. **Guaranteed Minimum Cap Rate:** 0.50%-4% based on market conditions.

#### Monthly Point to Point (MPT) Value Specifications

24. **Index:** Index to which these Index Credits are currently linked. Would vary only if it becomes necessary to substitute a suitable alternative index approved by DOI of issue state.
25. **Initial Premium:** Based on amount of Initial Premium and applicant's allocation of Initial Premium as shown on Application.
26. **Index on Contract Date:** At issue of each new contract, based on S&P 500 on the Contract Date
27. **MPT Cap Rate:** 1% to 6% based on market conditions.
28. **MPT Guaranteed Minimum Monthly Cap Rate:** 1-4% based on market conditions.

### Back Cover

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Marla Lacey  
Vice President, Chief Compliance Officer & General Counsel  
October 13, 2011

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## Supporting Document Schedules

	Item Status:	Status Date:
<b>Satisfied - Item:</b> Flesch Certification <b>Comments:</b> <b>Attachment:</b> AR111005-AR1.pdf		

	Item Status:	Status Date:
<b>Satisfied - Item:</b> Application <b>Comments:</b> Form 3505 Approved 3/11/2010 SERFF Tracking # AMEQ-126531820		

	Item Status:	Status Date:
<b>Satisfied - Item:</b> Life & Annuity - Acturial Memo <b>Comments:</b> N/A-Variable change only and doesn't affect minimum cash values provided in original filings.		

	Item Status:	Status Date:
<b>Satisfied - Item:</b> COVER LETTER <b>Comments:</b> <b>Attachment:</b> ARCoverLetter-111013.pdf		

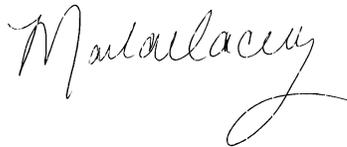
CERTIFICATION

TO: ARKANSAS INSURANCE DEPARTMENT

FROM: EAGLE LIFE INSURANCE COMPANY

Forms:  
INDEX-4-09R          Score of 50.0

This is to certify that the attached Forms achieve a Flesch Reading Ease Test Score, as indicated above,, and complies with the requirements of Ark. Stat. Ann. 23-80-201 through 23-80-308, cited as the Life and Disability Insurance Policy Language Simplification Act.



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Marla G. Lacey  
Vice President, Chief Compliance Officer & Associate General Counsel

October 5, 2011  
Date

AR1



*Marla G. Lacey*  
*Vice President, Chief Compliance Officer & General Counsel*

NAIC #13183  
FEIN 26-3218907

October 13, 2011

**Re: Cap and Rate Minimum Changes Only**

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## Superseded Schedule Items

Please note that all items on the following pages are items, which have been replaced by a newer version. The newest version is located with the appropriate schedule on previous pages. These items are in date order with most recent first.

Creation Date:	Schedule	Schedule Item Name	Replacement Creation Date	Attached Document(s)
10/05/2011	Form	VARIABILITY CHANGE	10/13/2011	4-09R stmtofVariability111005.pdf (Superseded)
10/05/2011	Supporting Document	COVER LETTER	10/13/2011	ARCoverLetter-111005.pdf (Superseded)

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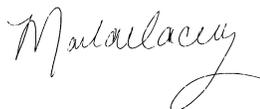
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Marla Lacey  
Vice President, Chief Compliance Officer & General Counsel  
October 7, 2011



*Marla G. Lacey*  
*Vice President, Chief Compliance Officer & General Counsel*

NAIC #13183  
FEIN 26-3218907

October 5, 2011

**Re: Cap and Rate Minimum Changes Only**

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Vice President, Chief Compliance Officer & General Counsel