

SERFF Tracking Number: ELAS-127727528 State: Arkansas
Filing Company: AXA Equitable Life Insurance Company State Tracking Number: 50040
Company Tracking Number: 2011EDCROTH-I
TOI: A02.11 Individual Annuities- Deferred Non- Sub-TOI: A02.11.002 Flexible Premium
Variable and Variable
Product Name: EQUI-VEST Series 200/201
Project Name/Number: EDC ROTH Endorsement Filing/2011EDCROTH-I

Filing at a Glance

Company: AXA Equitable Life Insurance Company

Product Name: EQUI-VEST Series 200/201 SERFF Tr Num: ELAS-127727528 State: Arkansas
TOI: A02.11 Individual Annuities- Deferred Non- SERFF Status: Closed-Approved- State Tr Num: 50040
Variable and Variable Closed
Sub-TOI: A02.11.002 Flexible Premium Co Tr Num: 2011EDCROTH-I State Status: Approved-Closed
Filing Type: Form Reviewer(s): Linda Bird
Author: Robert Palermo Disposition Date: 10/20/2011
Date Submitted: 10/17/2011 Disposition Status: Approved-Closed
Implementation Date Requested: 11/21/2011 Implementation Date:

State Filing Description:

General Information

Project Name: EDC ROTH Endorsement Filing
Project Number: 2011EDCROTH-I
Requested Filing Mode: Review & Approval
Explanation for Combination/Other:
Submission Type: New Submission
Overall Rate Impact:

Status of Filing in Domicile: Not Filed
Date Approved in Domicile:
Domicile Status Comments:
Market Type: Individual
Individual Market Type:
Filing Status Changed: 10/20/2011
State Status Changed: 10/20/2011
Created By: Robert Palermo
Corresponding Filing Tracking Number:

Deemer Date:

Submitted By: Robert Palermo

Filing Description:

Please see attached filing letter for details.

Company and Contact

Filing Contact Information

Gregory Prato, Assistant Vice President greg.prato@axa-equitable.com
1290 Avenue of the Americas, 14th Floor 212-314-5710 [Phone]
New York, NY 10104 212-314-3380 [FAX]

Filing Company Information

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AXA Equitable Life Insurance Company CoCode: 62944 State of Domicile: New York
 1290 Avenue of the Americas, 14-10 Group Code: 968 Company Type: LIFE Insurance
 New York,, NY 10104 Group Name: State ID Number:
 (212) 314-2921 ext. [Phone] FEIN Number: 13-5570651

Filing Fees

Fee Required? Yes
 Fee Amount: \$50.00
 Retaliatory? No
 Fee Explanation: 1 form - \$50.00 each (AR Fee) = \$50.00
 Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
AXA Equitable Life Insurance Company	\$50.00	10/17/2011	52893633

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Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved- Closed	Linda Bird	10/20/2011	10/20/2011

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Disposition

Disposition Date: 10/20/2011

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		No
Supporting Document	Application		No
Supporting Document	Life & Annuity - Acturial Memo		No
Supporting Document	Variable Text Memorandum		Yes
Supporting Document	Filing Letter		Yes
Form	ENDORSEMENT APPLICABLE TO DESIGNATED ROTH CONTRIBUTIONS TO CONTRACTS FUNDING GOVERNMENTAL EMPLOYER PLANS		Yes

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Form Schedule

Lead Form Number: 2011EDCROTH-I

Schedule Item Status	Form Number	Form Type	Form Name	Action	Action Specific Data	Readability	Attachment
	2011EDCROTH-I	Certificate Amendmen t, Insert Page, Endorseme nt or Rider	ENDORSEMENT APPLICABLE TO DESIGNATED ROTH CONTRIBUTIONS TO CONTRACTS FUNDING GOVERNMENTAL EMPLOYER PLANS	Initial			2011EDCROTH End 2011EDCROTH-I.pdf

**ENDORSEMENT APPLICABLE TO
DESIGNATED ROTH CONTRIBUTIONS TO CONTRACTS FUNDING
GOVERNMENTAL EMPLOYER PLANS**

In this Endorsement “we”, “our” or “us” means AXA Equitable. Any reference to “Annuitant” will also include “Participant” for purposes of this Endorsement. The provisions of this Endorsement apply to Contracts funding governmental employer plans and do not apply to any other Contracts, including those funding tax exempt employer plans.

This Endorsement is intended to meet the requirements of Section 402A of the Internal Revenue Code of 1986, as amended (“Code”).

The Contract is amended as follows:

SECTION on CONTRIBUTIONS: *(The following is added to the end of this Section)*

Contributions remitted to the Contract must use the allocation method approved by us that shows the source and the amount of each type of Contribution for each Annuitant.

If permitted by the Plan and as reported to us by the Employer, or the Employer’s Designee, where applicable, Contributions to the Contract determined by reference to compensation may be made as “designated Roth contributions” under Section 402A of the Code. Also if permitted by the Plan, and subject to our documentation requirements and procedures, we will accept (a) direct transfers of designated Roth contribution funds from another funding vehicle under the Plan or another governmental employer plan and (b) direct rollovers of designated Roth contribution funds from an applicable retirement plan described in Section 402A(e)(1) of the Code, which may be either a governmental employer Section 457(b) plan, a 401(k) plan, or a 403(b) plan.

Separate Accounting

If Contributions to the Contract determined by reference to compensation are made as designated Roth contributions as described above, we will maintain for the Annuitant a designated Roth Contribution Account for such Contributions. Income, gains, losses, and any other amounts credited or charged under the Contract will be separately allocated to this designated Roth Contribution Account on a reasonable and consistent basis. Employer contributions may not be allocated to this designated Roth Contribution Account. If, in addition to making designated Roth Contributions to the Contract determined by reference to compensation, the Plan permits direct rollover Contributions to the Contract of designated Roth contribution funds from another applicable retirement plan as described above, we will maintain for the Annuitant a second designated Roth direct rollover Contribution Account for such Contributions. Income, gains, losses, and any other amounts credited or charged under the Contract will be separately allocated to the designated Roth direct rollover Contribution Account.

The separate accounting requirement will apply from the time any designated Roth Contribution is made and ends only when all amounts in designated Roth Contribution Accounts are completely distributed in accordance with the terms of this Contract.

If permitted by the Plan, as reported to us by the Employer, or the Employer's Designee, where applicable, the Annuitant may elect the source of a transaction: That is, whether a withdrawal, transfer, loan or other distribution permitted under the Plan and Contract will be made from a designated Roth Contribution Account or from other accounts maintained for the Annuitant under this Contract.

SECTION on DIRECT ROLLOVERS: *(The following is added to the end of this Section)*

Limits on Distributions

For purposes of Sections 457(d) and 401(a)(31) of the Code, amounts from a designated Roth Contribution Account may be directly rolled over only to another plan maintaining a designated Roth contribution account or to a Roth IRA.

AXA EQUITABLE LIFE INSURANCE COMPANY

[



Mark Pearson,
Chairman of the Board and Chief Executive Officer]

[



Karen Field Hazin, Vice President,
Secretary and Associate General Counsel]

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Supporting Document Schedules

	Item Status:	Status Date:
Bypassed - Item: Flesch Certification		
Bypass Reason: Not applicable to Variable Annuity/SEC regulated product.		
Comments:		

	Item Status:	Status Date:
Bypassed - Item: Application		
Bypass Reason: Not applicable - Please see filing letter.		
Comments:		

	Item Status:	Status Date:
Bypassed - Item: Life & Annuity - Acturial Memo		
Bypass Reason: N/A, no Actuarial Memorandum for this endorsement filing.		
Comments:		

	Item Status:	Status Date:
Satisfied - Item: Variable Text Memorandum		
Comments:		
Attachment: VTM 2011EDCROTH-I.pdf		

	Item Status:	Status Date:
Satisfied - Item: Filing Letter		
Comments:		
Attachment: AR- Equi-vest Series 200-201 EDC Roth Filing Letter.pdf		

AXA EQUITABLE LIFE INSURANCE COMPANY

**Statement of Variability
For Endorsement 2011EDCROTH-I**

The following comments describe the nature and scope of the illustrative and variable material contained in the endorsement form shown in brackets.

1. **Page 2:** The Company Officer's signatures and titles are bracketed and may change in the future.



Susan Shamlan
Director - Policy Forms
Annuity Product Management & Filing

October 17, 2011

Mr. Jay Bradford, Insurance Commissioner
Arkansas Insurance Department
1200 West Third Street
Little Rock, AR 72201-1904

RE: AXA Equitable Life Insurance Company
NAIC No.: 968-62944
FEIN 13-5570651
2011EDCROTH-I - Endorsement

Dear Mr. Bradford:

We are filing for approval the above referenced Endorsement. This form is new and will not replace any previously approved form. Upon approval, this form will allow governmental plans utilizing the forms described below to accept designated Roth contributions.

The enclosed Endorsement is designed in accordance with Section 2111 of the Small Business Jobs Act of 2010, PL 111-240, which amended Section 402A(e) of the Internal Revenue Code of 1986 to permit designated Roth contributions to be made to governmental employer Section 457(b) plans. The Endorsement has been developed with the advice and approval of our Senior Tax Counsel.

Endorsement 2011EDCROTH-I will be applicable to our existing owners and new owners as noted in the chart below.

Contract/Certificate	Date Approved by the Department	State File No.	Type of Owner
2002EDCA	01/10/2003	N/A	For Existing Owners
92EDCA	03/12/1992	N/A	For Existing Owners
2006BASE-I-A	03/27/2006	32068	For New and Existing Owners

In addition, we have enclosed a Memorandum of Variable Material. This Endorsement does not affect the Actuarial Basis Memorandums currently on file with the Department for each of the previously approved Contracts/Certificates listed above.

If you have any questions or need additional information, you may contact me at (212) 314-6742 or Greg Prato at (212) 314-5710.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Shamlian". The signature is written in a cursive style with a horizontal line at the end.

Susan Shamlian
Director - Policy Forms