

SERFF Tracking Number: SALA-127063611 State: Arkansas
 Filing Company: SunAmerica Annuity and Life Assurance Company State Tracking Number: 48221
 Company Tracking Number:
 TOI: A02.1G Group Annuities - Deferred Non-Variable and Variable Sub-TOI: A02.1G.002 Flexible Premium
 Product Name: MAV DB Endorsement
 Project Name/Number: /

Filing at a Glance

Company: SunAmerica Annuity and Life Assurance Company

Product Name: MAV DB Endorsement SERFF Tr Num: SALA-127063611 State: Arkansas
 TOI: A02.1G Group Annuities - Deferred Non-Variable and Variable SERFF Status: Closed-Approved-Closed State Tr Num: 48221
 Sub-TOI: A02.1G.002 Flexible Premium Co Tr Num: State Status: Approved-Closed
 Filing Type: Form Reviewer(s): Linda Bird
 Authors: Tina Smith, Aly Lopez Disposition Date: 03/15/2011
 Date Submitted: 03/10/2011 Disposition Status: Approved-Closed
 Implementation Date Requested: Implementation Date:
 State Filing Description:

General Information

Project Name: Status of Filing in Domicile: Authorized
 Project Number: Date Approved in Domicile:
 Requested Filing Mode: Review & Approval Domicile Status Comments: Domiciliary state, Arizona, exempts this filing per ARS 20-1110.F and R20-6-218.
 Explanation for Combination/Other: Market Type: Group
 Submission Type: New Submission Group Market Size:
 Group Market Type: Overall Rate Impact:
 Filing Status Changed: 03/15/2011
 State Status Changed: 03/15/2011 Deemer Date:
 Created By: Aly Lopez Submitted By: Aly Lopez
 Corresponding Filing Tracking Number:
 Filing Description:

We are submitting the above-mentioned out-of-state group annuity form for your review and approval. It is a new form and is not intended to replace any form previously approved by your Department. Domiciliary state, Arizona, exempts this filing per ARS 20-1110.F and R20-6-218.

Endorsement Form ASE-6235-PAVG (12/10) is an optional maximum anniversary value death benefit endorsement that

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may be elected for an additional charge. This endorsement provides a death benefit payable before the Annuity Date of an amount equal to the greatest of the contract value on the date of death, purchase payments adjusted for withdrawals, or the maximum anniversary value prior to the 83rd birthday. This endorsement also provides for spousal beneficiary continuation upon the death of the owner. While this endorsement is very similar to the previously approved version of the endorsement (form ASE-6235 (6/08)), the key difference is that it has been revised to reflect new calculations for the treatment of withdrawals and the ages to which it applies.

To the best of our knowledge and belief, this submission is in compliance with the statutes and regulations of your state and contains nothing that has been previously objected to or disapproved by your Department. No part of this filing contains any unusual or possibly controversial items from normal company or industry standards.

The above referenced form attains Flesch readability score of 50.8.

The mentioned form when approved may be used with approved annuity contracts when appropriate.

Company and Contact

Filing Contact Information

Aly Lopez, Contract Analyst II alopez@sunamerica.com
 1999 Ave of the Stars 800-871-2000 [Phone] 6195 [Ext]
 37th Floor 310-772-6569 [FAX]
 Los Angeles, CA 90701

Filing Company Information

SunAmerica Annuity and Life Assurance CoCode: 60941 State of Domicile: Arizona
 Company
 1999 Ave of the Stars Group Code: Company Type: Annuity
 37th Floor Group Name: AIG State ID Number:
 Los Angeles, CA 90067 FEIN Number: 86-0198983
 (800) 871-2000 ext. [Phone]

Filing Fees

Fee Required? No
 Retaliatory? No

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Fee Explanation:
Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
SunAmerica Annuity and Life Assurance Company	\$50.00	03/10/2011	45464155

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Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved- Closed	Linda Bird	03/15/2011	03/15/2011

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Disposition

Disposition Date: 03/15/2011

Implementation Date:

Status: Approved-Closed

Comment:

Rate data does NOT apply to filing.

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Form Schedule

Lead Form Number:

Schedule Item Status	Form Number	Form Type	Form Name	Action	Action Specific Data	Readability	Attachment
	ASE-6235-PAVG (12/10)	Policy/Contract	Maximum Fraternal Anniversary Value Optional Death Certificate: Benefit Endorsement Amendment, Insert Page, Endorsement or Rider	Initial		0.000	ASE-6235-PAVG (12-10) cln.pdf

SUNAMERICA ANNUITY AND LIFE ASSURANCE COMPANY

**MAXIMUM ANNIVERSARY VALUE OPTIONAL
DEATH BENEFIT ENDORSEMENT**

Notwithstanding any provision in the Contract or Certificate (“Contract”) to the contrary, this Endorsement becomes a part of the Contract to which it is attached. Should any provision in this Endorsement conflict with the Contract, the provisions of this Endorsement will prevail. Capitalized terms used in this Endorsement have the same meaning as they have in the Contract.

This Endorsement modifies the “**DEATH PROVISIONS**” in the Contract as set forth below.

ENDORSEMENT DATA

**MAXIMUM ANNIVERSARY VALUE
OPTIONAL DEATH BENEFIT
CHARGE:**

Annual fee of [0.25%] of the average daily ending value of the assets attributable to the Accumulation Units of the Variable Portfolio(s) to which Your Contract is allocated. We deduct this charge daily. This charge is in addition to other charges, fees and expenses described in Your Contract.

The “**AMOUNT OF DEATH BENEFIT**” provisions are modified as follows:

Maximum Anniversary Value Death Benefit

Upon Our receipt of all Required Documentation at Our Annuity Service Center, the Death Benefit payable upon the death of the Owner will be calculated. The death benefit calculation is different depending on whether a living benefit or guaranteed minimum withdrawal benefit has been elected and if the benefit has been terminated.

If You were Age [80 or younger] on the Contract Date and did not elect a living benefit or guaranteed minimum withdrawal benefit, We will calculate the Death Benefit as the greatest of:

1. The Contract Value for the NYSE business day during which We receive all Required Documentation at Our Annuity Service Center; or
2. Net Purchase Payment(s) received prior to the Owner’s [86th] birthday; or
3. The Maximum Anniversary Value that is equal to the greatest anniversary value determined prior to the earlier of the
 - i) Your [83rd] birthday; or
 - ii) Your date of death;plus Purchase Payment(s) received since that Contract anniversary, but prior to Your [86th] birthday, and this sum is reduced proportionately for any Withdrawals since that Contract anniversary.

If You were Age [80 or younger] on the Contract Date and elected a living benefit or guaranteed minimum withdrawal benefit, We will calculate the Death Benefit as the greatest of:

1. The Contract Value for the NYSE business day during which We receive all Required Documentation at Our Annuity Service Center; or
2. Purchase Payment(s) received prior to Your [86th] birthday reduced by a) or b) as follows:
 - a) any Withdrawal Adjustments if the benefit has not been terminated;
 - b) any Withdrawal Adjustments prior to the date the benefit is terminated, and reduced proportionately for any Withdrawals on and after the date the benefit is terminated.
3. The Maximum Anniversary Value that is equal to the greatest anniversary value determined prior to the earlier of:
 - i) Your [83rd] birthday; or
 - ii) Your date of death;plus Purchase Payment(s) received since that Contract anniversary, but prior to Your [86th] birthday, and this sum is reduced by a) or b) as follows:
 - a) any Withdrawal Adjustments if the benefit has not been terminated;
 - b) any Withdrawal Adjustments prior to the date the benefit is terminated, and reduced proportionately for any Withdrawals on and after the date the benefit is terminated.

Spousal Beneficiary Continuation

If the Spousal Beneficiary continues the Contract on the Continuation Date and upon Our receipt of all Required Documentation at Our Annuity Service Center, the Death Benefit payable upon the death of the Spousal Beneficiary will be as follows:

If the Spousal Beneficiary was age [80 or younger] on the Continuation Date, and if the Owner did not elect a living benefit or guaranteed minimum withdrawal benefit, We will calculate the Death Benefit as the greatest of:

1. The Contract Value for the NYSE business day during which We receive all Required Documentation at Our Annuity Service Center; or
2. The Contract Value on the Continuation Date, plus Purchase Payment(s) received after the Continuation Date and prior to the Spousal Beneficiary's [86th] birthday and this sum is reduced proportionately for any Withdrawals after the Continuation Date; or
3. The Maximum Anniversary Value after the Continuation Date that is equal to the greatest anniversary value determined prior to the earlier of:
 - i) The Spousal Beneficiary's [83rd] birthday; or
 - ii) The Spousal Beneficiary's date of death;plus Purchase Payment(s) received after the Continuation Date and since that Contract anniversary, and prior to the Spousal Beneficiary's [86th] birthday and this sum is reduced proportionately for any Withdrawals since that Contract anniversary.

If the Spousal Beneficiary was age [80 or younger] on the Continuation Date, and if the Owner elected a living benefit or guaranteed minimum withdrawal benefit, We will calculate the Death Benefit as the greatest of:

1. The Contract Value for the NYSE business day during which We receive all Required Documentation at Our Annuity Service Center; or
2. The Contract Value on the Continuation Date, plus Purchase Payment(s) received after the Continuation Date and prior to the Spousal Beneficiary's [86th] birthday and this sum is reduced by a) or b) as follows:
 - a) any Withdrawal Adjustments if the benefit has not been terminated;
 - b) any Withdrawal Adjustments prior to the date the benefit is terminated, and reduced proportionately for any Withdrawals on and after the date the benefit is terminated; or
3. The Maximum Anniversary Value after the Continuation Date that is equal to the greatest anniversary value determined prior to the earlier of:
 - i) The Spousal Beneficiary's [83rd] birthday; or
 - ii) The Spousal Beneficiary's date of death;
 plus Purchase Payment(s) received after the Continuation Date and since that Contract anniversary, and prior to the Spousal Beneficiary's [86th] birthday and this sum is reduced by a) or b) as follows:
 - a) any Withdrawal Adjustments since that anniversary if the benefit has not been terminated;
 - b) any Withdrawal Adjustments since that anniversary but prior to the date the benefit is terminated, and reduced proportionately for any Withdrawals since that anniversary that occur on and after the date the benefit is terminated.

Withdrawal Adjustments

If a living benefit or guaranteed minimum withdrawal benefit is elected and the benefit has not been terminated, the amount of the Death Benefit will be adjusted for Withdrawals as follows:

1. If the current Contract Year's cumulative Withdrawals, including the current Withdrawal, are taken prior to your [81st] birthday and are less than or equal to the Maximum Annual Withdrawal Amount, the amount of adjustment will be the amount of each Withdrawal; or
2. If the current Contract Year's cumulative Withdrawals, including the current Withdrawal, are taken on and/or after your [81st] birthday and/or are in excess of the Maximum Annual Withdrawal Amount, the amount of adjustment is equal to the proportion that the amount of each Withdrawal in excess of the Maximum Annual Withdrawal Amount reduces the Contract Value.

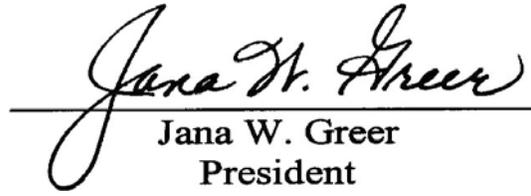
If the Spousal Beneficiary was age [81 or older] on the Continuation Date, the Death Benefit will be the Contract Value for the NYSE business day during which We receive all Required Documentation at Our Annuity Service Center.

Signed for the Company to be effective on the Contract Date.

SUNAMERICA ANNUITY AND LIFE ASSURANCE COMPANY



Mallery L. Reznik
Senior Vice President



Jana W. Greer
President

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Supporting Document Schedules

Item Status:

Status

Date:

Satisfied - Item: Flesch Certification

Comments:

Attachments:

CofR 3.7.11.pdf

AR- Cert of Comp (Reg 6) 3.7.11.pdf

AR- Cert of Comp (Reg 19) 3.7.11.pdf

SUNAMERICA ANNUITY AND LIFE ASSURANCE COMPANY
1 SunAmerica Center
Los Angeles, CA 90067-6022

CERTIFICATION OF READABILITY

This is to certify that the form(s) listed below is/are in compliance with the Flesch Readability Score

A. Option Selected

- 1. Policy and its related forms are scored for the Flesch reading ease test as one unit and the combined score is _____.
- 2. Policy and its related forms are scored separately for the Flesch reading ease test. Scores for the Policy are indicated below.

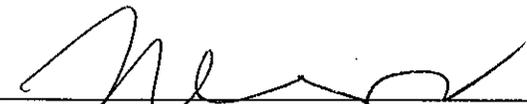
Forms and Form Numbers to which Certificate is applicable:

<u>Form</u>	<u>Form Number</u>	<u>Flesch Score</u>
Endorsement	ASE-6235-PAVG (12/10)	50.8

B. Test Option Selected

- 1. Test was applied to entire policy form(s).
- 2. Test was applied on sample basis. Form(s) contain(s) more than 10,000 words. Copy of form(s) enclosed indicating word samples tested.

Signed for the Company at Los Angeles, California on 3/7/14.



Manda Ghaferi, Vice President

**SUNAMERICA ANNUITY AND LIFE ASSURANCE COMPANY
1 SUNAMERICA CENTER
LOS ANGELES, CALIFORNIA 90067-6022**

Certification of Compliance

SUNAMERICA ANNUITY AND LIFE ASSURANCE COMPANY does hereby certify that the following listed form(s):

Endorsement: ASE-6235-PAVG (12/10)

Do comply with all Sections of the **Arkansas** Insurance Code and regulations applicable to such insurance policies and related forms, and will be so construed. We also certify that we are in compliance with Rule and Regulation 6 regarding Variable Annuity Contracts.

3/2/14
Date



Manda Ghaferi
Assistant Vice President

**SUNAMERICA ANNUITY AND LIFE ASSURANCE COMPANY
1 SUNAMERICA CENTER
LOS ANGELES, CALIFORNIA 90067-6022**

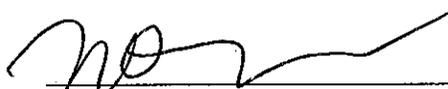
Certification of Compliance

SUNAMERICA ANNUITY AND LIFE ASSURANCE COMPANY does hereby certify that the following listed form(s):

ASE-6235-PAVG (12/10)

Do comply with all Sections of the **Arkansas** Insurance Code and regulations applicable to such insurance policies and related forms, and will be so construed. We also certify that we are in compliance with Rule and Regulation 19 (2nd Revision) regarding Unfair Sex Discrimination in the Sale of Insurance.

3/7/14
Date



Manda Ghaferi
Vice President