

SERFF Tracking Number: PRUD-127132441 State: Arkansas
Filing Company: Pruco Life Insurance Company State Tracking Number: 48535
Company Tracking Number: 0198237-00001-00
TOI: A03I Individual Annuities - Deferred Variable Sub-TOI: A03I.002 Flexible Premium
Product Name: AST Quantitative Modeling Portfolio At a Glance
Project Name/Number: AST Quantitative Modeling Portfolio At a Glance/0198237-00001-00

Filing at a Glance

Company: Pruco Life Insurance Company
Product Name: AST Quantitative Modeling
Portfolio At a Glance

TOI: A03I Individual Annuities - Deferred
Variable

Sub-TOI: A03I.002 Flexible Premium

Filing Type: Form

SERFF Tr Num: PRUD-127132441 State: Arkansas

SERFF Status: Closed-Filed-
Closed

Co Tr Num: 0198237-00001-00

Author: Kristin Jaekle

Date Submitted: 04/19/2011

State Tr Num: 48535

State Status: Filed-Closed

Reviewer(s): Linda Bird

Disposition Date: 04/21/2011

Disposition Status: Filed-Closed

Implementation Date:

Implementation Date Requested: On Approval

State Filing Description:

General Information

Project Name: AST Quantitative Modeling Portfolio At a Glance

Project Number: 0198237-00001-00

Requested Filing Mode: Review & Approval

Explanation for Combination/Other:

Submission Type: New Submission

Overall Rate Impact:

Deemer Date:

Submitted By: Kristin Jaekle

Status of Filing in Domicile: Not Filed

Date Approved in Domicile:

Domicile Status Comments:

Market Type: Individual

Individual Market Type:

Filing Status Changed: 04/21/2011

State Status Changed: 04/21/2011

Created By: Kristin Jaekle

Corresponding Filing Tracking Number:

0198237-00001-00

Filing Description:

Please see Cover Letter is Supporting Documentation.

Company and Contact

Filing Contact Information

Louis Bunosso, Manager, Annuities

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Compliance

Prudential

203-944-7522 [Phone]

1 Corporate Dr.

SERFF Tracking Number: PRUD-127132441 State: Arkansas
 Filing Company: Pruco Life Insurance Company State Tracking Number: 48535
 Company Tracking Number: 0198237-00001-00
 TOI: A031 Individual Annuities - Deferred Variable Sub-TOI: A031.002 Flexible Premium
 Product Name: AST Quantitative Modeling Portfolio At a Glance
 Project Name/Number: AST Quantitative Modeling Portfolio At a Glance/0198237-00001-00
 Shelton, CT 06484-6208

Filing Company Information

Pruco Life Insurance Company	CoCode: 79227	State of Domicile: Arizona
751 Broad Street	Group Code: 304	Company Type: Life
Newark, NJ 07102-3777	Group Name:	State ID Number:
(973) 802-6000 ext. [Phone]	FEIN Number: 22-1944557	

Filing Fees

Fee Required? No
 Retaliatory? No
 Fee Explanation:
 Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Pruco Life Insurance Company	\$50.00	04/19/2011	46737430

SERFF Tracking Number: PRUD-127132441 State: Arkansas
Filing Company: Pruco Life Insurance Company State Tracking Number: 48535
Company Tracking Number: 0198237-00001-00
TOI: A031 Individual Annuities - Deferred Variable Sub-TOI: A031.002 Flexible Premium
Product Name: AST Quantitative Modeling Portfolio At a Glance
Project Name/Number: AST Quantitative Modeling Portfolio At a Glance/0198237-00001-00

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Filed-Closed	Linda Bird	04/21/2011	04/21/2011

SERFF Tracking Number: PRUD-127132441 *State:* Arkansas
Filing Company: Pruco Life Insurance Company *State Tracking Number:* 48535
Company Tracking Number: 0198237-00001-00
TOI: A031 Individual Annuities - Deferred Variable *Sub-TOI:* A031.002 Flexible Premium
Product Name: AST Quantitative Modeling Portfolio At a Glance
Project Name/Number: AST Quantitative Modeling Portfolio At a Glance/0198237-00001-00

Disposition

Disposition Date: 04/21/2011

Implementation Date:

Status: Filed-Closed

Comment:

Rate data does NOT apply to filing.

SERFF Tracking Number: PRUD-127132441 State: Arkansas
 Filing Company: Pruco Life Insurance Company State Tracking Number: 48535
 Company Tracking Number: 0198237-00001-00
 TOI: A031 Individual Annuities - Deferred Variable Sub-TOI: A031.002 Flexible Premium
 Product Name: AST Quantitative Modeling Portfolio At a Glance
 Project Name/Number: AST Quantitative Modeling Portfolio At a Glance/0198237-00001-00

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	Cover Letter		No
Form	AST Quantitative Modeling Portfolio At a Glance		No

SERFF Tracking Number: PRUD-127132441 State: Arkansas
 Filing Company: Pruco Life Insurance Company State Tracking Number: 48535
 Company Tracking Number: 0198237-00001-00
 TOI: A031 Individual Annuities - Deferred Variable Sub-TOI: A031.002 Flexible Premium
 Product Name: AST Quantitative Modeling Portfolio At a Glance
 Project Name/Number: AST Quantitative Modeling Portfolio At a Glance/0198237-00001-00

Form Schedule

Lead Form Number: 0198237-00001-00

Schedule Item Status	Form Number	Form Type	Form Name	Action	Action Specific Data	Readability	Attachment
	0198237-00001-00	Advertising	AST Quantitative Modeling Portfolio At a Glance	Initial			0198237-00001-00.pdf



AST Quantitative Modeling Portfolio

A Risk-Managed Portfolio that Seeks a High Potential Return While Attempting to Mitigate Downside Risk

PRUDENTIAL ANNUITIES®



THE HIGHEST DAILY COMPANY®

Please note that there are no guarantees associated with this portfolio. Optional living or death benefits are not available if this portfolio is selected on Premier Retirement and Premier Advisor variable annuities.

This material must be preceded or accompanied by the current variable annuity product prospectus. Issued by Pruco Life Insurance Company and by Pruco Life Insurance Company of New Jersey.

ANNUITIES:

• NOT A DEPOSIT • NOT FDIC INSURED • NOT INSURED BY ANY FEDERAL GOVERNMENT AGENCY
• NOT BANK OR CREDIT UNION GUARANTEED • MAY LOSE VALUE

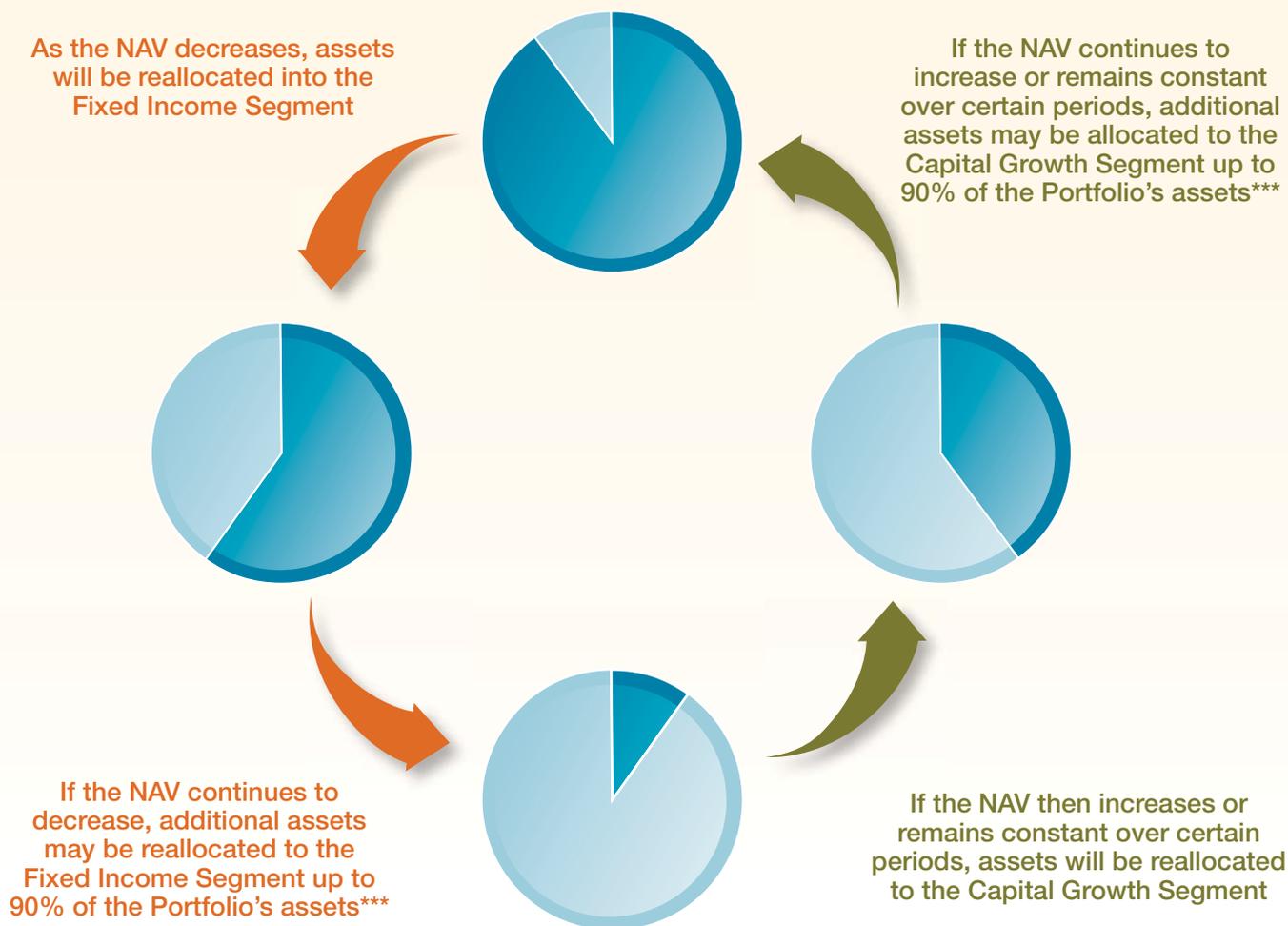


Prudential

Rebalancing of the Quantitative Modeling Portfolio:

Assets in the Quantitative Modeling Portfolio can be reallocated between the Capital Growth Segment and the Fixed Income Segment based upon the application of a quantitative model to the Portfolio's net asset value (NAV)* per share.**

- If the NAV of the Portfolio increases or remains constant over certain periods, the model may reallocate assets to the Capital Growth Segment up to a maximum of 90%.***
- If the NAV of the Portfolio decreases, the model may reallocate assets to the Fixed Income Segment up to a maximum of 90%.***



■ Capital Growth Segment ■ Fixed Income Segment

* NAV, or "Net Asset Value," is the value at which a single share of a portfolio may be bought or sold. This value is based on the market value of all of the investment instruments held by the portfolio (assets minus liabilities). Fluctuations in the market value of these investments may change the NAV of a portfolio, even if no securities are bought or sold by the portfolio. Changes in a portfolio's NAV can be used to measure the investment performance of that portfolio.

** Subject to predetermined thresholds to reduce transaction costs. Please see bottom of page 4 for more information.

*** Despite these limits on transfers between the two Segments, more than 90% of the Portfolio's assets may be held in a particular Segment at a given point in time due to an increase in the value of that Segment and/or a decline in the value of the other Segment.

Portfolio Overview

PORTFOLIO OBJECTIVE: To seek a high potential return while attempting to mitigate downside risk during adverse market cycles.

INVESTMENT MANAGERS: Prudential Investments LLC (PI) and AST Investment Services, Inc. (ASTIS)

SUBADVISER: Quantitative Management Associates, LLC (QMA)*

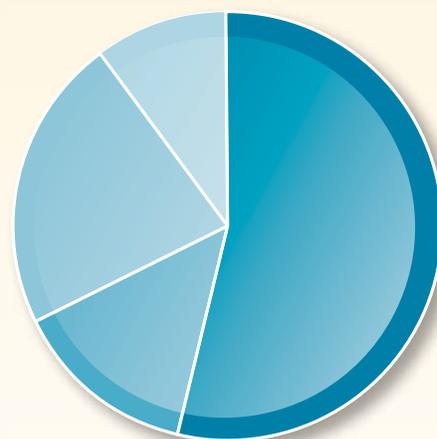
- Highly experienced and stable team: 35 investment professionals, including 10 PhDs
- Leading-edge research and rigorous testing to help find opportunities that conventional analysis may overlook
- \$80 billion in assets under management, as of 12/31/10
- Worldwide institutional client base

PORTFOLIO HOLDINGS: The AST Quantitative Modeling Portfolio operates as a “fund of funds” and leverages the expertise and skill of top asset managers in the industry. Assets are allocated to a Capital Growth Segment and a Fixed Income Segment. This Portfolio may allocate between the two segments based upon the application of a quantitative model in an attempt to seek a high potential return and to mitigate downside risk during adverse market cycles.

- **Capital Growth Segment** – comprised primarily of equity funds, with a smaller portion invested in debt and money market funds
- **Fixed Income Segment** – invested in the AST Investment Grade Bond Portfolio

EXPECTED INITIAL ALLOCATION**

At inception, as of 05/02/11



Capital Growth Segment***

- Domestic Equity / 54%
- International Equity / 14%
- Debt/Money Market Instruments / 22%

Fixed Income Segment

- AST Investment Grade Bond Portfolio / 10%

* Quantitative Management Associates, LLC is a wholly owned subsidiary of Prudential Investment Management Inc. and an indirect, wholly owned subsidiary of Prudential Financial, Inc.

** This sample Portfolio reflects an initial allocation on May 2, 2011 of 90% to the Capital Growth Segment and 10% to the Fixed Income Segment. The quantitative model used by the subadviser will not, however, generate a reallocation from one segment to the other segment to the extent such reallocation would result in more than 90% of the Portfolio's assets being allocated to a particular segment.

*** QMA is responsible for the overall allocation of Capital Growth Segment assets among the various asset classes. PI is responsible for selecting weighted combinations of underlying funds that are consistent with QMA's asset allocation. The PI team has over 10 years of experience conducting research and analysis on managers and conducts more than 300 investment manager interviews per year. The estimates above are preliminary and subject to change.



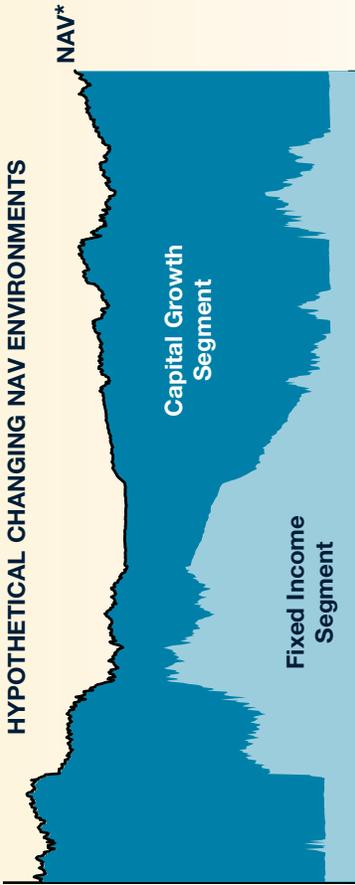
JENNISON ASSOCIATES



P I M C O

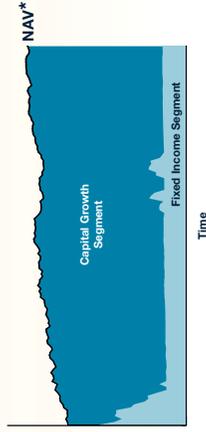


HYPOTHETICAL CHANGING NAV ENVIRONMENTS



The illustrations on this page are examples of how the AST Quantitative Modeling Portfolio may reallocate assets to and from the Fixed Income Segment as the Portfolio's NAV fluctuates. Investors would buy into the Portfolio at the then-current allocation and all investors would have the same experience in allocation behavior going forward.

HYPOTHETICAL SCENARIO #1: Increasing NAV Environment

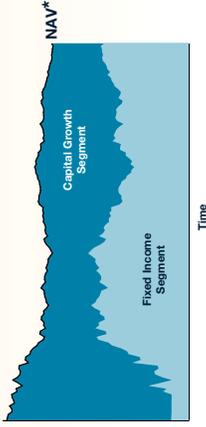


KEY HIGHLIGHTS:

- Increases in NAV may increase allocation to the Capital Growth Segment, subject to the 90% maximum reallocations
- Allocations can remain at or above 90/10 (Capital Growth/Fixed Income Segment) until the NAV declines

**Represents the hypothetical performance of the Portfolio, including reinvestment of all distributions; this does not represent any actual reported NAV. These charts are hypothetical examples for illustrative purposes only.*

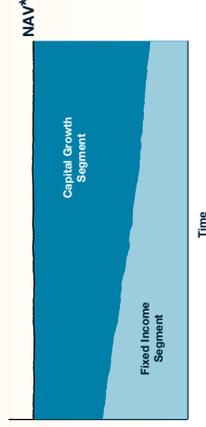
HYPOTHETICAL SCENARIO #2: Decreasing NAV Environment



KEY HIGHLIGHTS:

- Declines in NAV may increase allocations to the Fixed Income Segment, subject to the 90% maximum reallocations
- As the NAV steadies or increases, assets may be reallocated into the Capital Growth Segment

HYPOTHETICAL SCENARIO #3: Flat NAV Environment



KEY HIGHLIGHTS:

- A flat NAV may increase allocations to the Capital Growth Segment over time
- Movements to the Capital Growth Segment may enable the Portfolio to participate in a future equity market rally

The risks identified below are certain of the principal risks of investing in the Portfolio. All investments have risks to some degree and it is possible that you could lose money by investing in the Portfolio. An investment in the Portfolio is not a deposit with a bank and is not insured or guaranteed by the Federal Deposit Insurance Corporation or any other government agency. While the Portfolio makes every effort to achieve its objective, it cannot guarantee success.

In an effort to reduce transaction costs, the Investment Managers or QMA may decline to implement a transfer between the Portfolio's segments that would otherwise be initiated by the quantitative model to the extent such transfer does not exceed certain pre-determined percentage thresholds. In addition, the quantitative model is proprietary and may be changed by the Investment Managers or QMA over time. The Investment Managers or QMA may determine that such a change is appropriate for a variety of reasons, including, without limitation, due to changing market, financial, or economic conditions or to make enhancements to the model based on actual experience.

Equity securities risk. There is the risk that the value or price of a particular stock or other equity or equity-related security owned by the Portfolio could go down and you could lose money. In addition to an individual stock losing value, the value of the equity markets or a sector of those markets in which the Portfolio invests could go down.

Fixed income securities risk. Investment in fixed income securities involves a variety of risks, including the risk that an issuer or guarantor of a security will be unable to pay some or all of the principal and interest when due (credit risk); the risk that the Portfolio may not be able to sell some or all of the securities it holds, either at the price it values the security or at any price (liquidity risk); and the risk that the rates of interest income generated by the fixed income

investments of the Portfolio may decline due to a decrease in market interest rates and that the market prices of the fixed income investments of the Portfolio may decline due to an increase in market interest rates (interest rate risk).

Management risk. Management risk includes the risk that the underlying portfolios selected by the investment managers as fulfillment options, the asset allocation decisions made by QMA, the sole subadvisor to the Portfolio, and the securities and other financial instruments selected by the subadvisors for those underlying portfolios will underperform the market, the relevant indices, or other funds with similar investment objectives and investment strategies. All decisions by an adviser require judgment and are based on imperfect information. Additionally, the investment techniques, risk analysis and investment strategies used by the investment managers or a subadvisor in making investment decisions for the Portfolio or an underlying portfolio may not produce the desired results.

Market risk. Market risk is the risk that the markets in which the Portfolio invests will experience market volatility and go down in value, including the possibility that a market will go down sharply and unpredictably.

Quantitative model risk. The performance of the Portfolio will depend, in part, on how its assets are allocated and reallocated between the Capital Growth segment and the Fixed Income segment as a result of the operation of the quantitative model. Such quantitative model, however, has no actual operating history. In addition, the application of the model may not produce the desired results.

The Portfolio may be exposed to additional market risk due to its policy of automatically transferring Portfolio assets between the Capital Growth segment and the Fixed Income segment based on the application of a quantitative model to certain changes in the NAV per share of the Portfolio as described herein. As a result of this policy, such asset transfers will not be made directly in response to broader market fluctuations. *(Risks continued on back cover.)*

To the extent this management style is non-dynamic, the Portfolio may subject investors to greater market risk than other mutual funds. At any given time, a certain percentage of the Portfolio's net assets will be allocated to the Capital Growth Segment and a certain percentage of the Portfolio's net assets will be allocated to the Fixed Income segment as directed by the quantitative model as described herein.

The greater the percentage of the Portfolio's net assets that are allocated to a particular segment, the greater the effect the performance of that segment will have in determining whether and to what extent Portfolio assets will be transferred from that segment to the other segment. For example, if a substantial portion of the Portfolio's net assets were allocated to the Fixed Income segment and such segment had worse performance than the Capital Growth segment over certain periods of time, the model may, under certain circumstances, initiate a transfer of Portfolio assets from the higher-performing Capital Growth segment to the lower-performing Fixed Income segment. Likewise, if a substantial portion of the Portfolio's net assets were allocated to the Fixed Income segment but such segment had better performance than the Capital Growth segment over certain periods of time, the model may, under certain circumstances, initiate a transfer of Portfolio assets from the higher-performing Fixed Income segment to the lower-performing Capital Growth segment. On the other hand, if a substantial portion of the Portfolio's net assets were allocated to the Capital Growth segment and such segment had worse performance than the Fixed Income segment over certain periods of time, the model may, under certain circumstances, initiate a transfer of Portfolio assets from the lower-performing Capital Growth segment to the higher-performing Fixed Income segment. Likewise, if a substantial portion of the Portfolio's net assets were allocated to the Capital Growth segment but such segment had better performance than the Fixed Income segment over certain periods of time, the model may, under certain circumstances, initiate a transfer of Portfolio assets from the lower-performing Fixed Income segment to the higher-performing Capital Growth segment. Finally, application of the quantitative model's built-in transfer thresholds (i.e., prohibitions against: (i) transfers between the Portfolio's segments to the extent such transfers would cause more than 90% of the Portfolio's net assets from being allocated to a particular segment and (ii) large-scale transfers between the Portfolio's segments to the extent such transfers exceed certain pre-determined percentage amounts) may adversely affect Portfolio performance.

Portfolio assets that have been allocated to the Fixed Income segment also will not be available to participate in the performance of the Capital Growth segment's equity underlying portfolios until such assets have actually been transferred to the Capital Growth segment. As a result, Portfolio assets may not be transferred from the Fixed Income segment to the Capital Growth segment in time for the Portfolio to fully participate in all of the positive returns enjoyed by the Capital Growth segment's equity underlying portfolios during periods in which equity markets are rising rapidly.

Recent Events Risk. The financial crisis has caused a significant decline in the value and liquidity of many securities. This environment could make identifying investment risks and opportunities especially difficult for the subadvisor. These market conditions may continue or get worse. In response to the crisis, the U.S. and other governments and the Federal Reserve and certain foreign central banks have taken steps to support financial markets. The withdrawal of this support could negatively affect the value and liquidity of certain securities. In addition, legislation recently enacted in the United States calls for changes in many aspects of financial regulation. The impact of the legislation on the markets, and the practical implications for market participants, may not be known for some time.

Investors should consider the features of the contract and the underlying portfolios' investment objectives, policies, management, risks, charges and expenses carefully before investing. This and other important information is contained in the prospectus, which can be obtained from your financial professional. Please read the prospectus carefully before investing.

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A variable annuity is a long-term investment designed to create guaranteed income in retirement. Investment returns and the principal value of an investment will fluctuate so that an investor's units, when redeemed, may be worth more or less than the original investment. Withdrawals or surrenders may be subject to contingent deferred sales charges. Withdrawals and distributions of taxable amounts are subject to ordinary income tax and, if made prior to age 59½, may be subject to an additional 10% federal income tax penalty. Withdrawals, other than from IRAs or employer retirement plans, are deemed to be gains out first for tax purposes. Withdrawals can reduce the account value and the living and death benefits.

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Issued on Contracts: P-B/IND(2/10), P-L/IND(2/10), P-X/IND(2/10), P-CR/IND(2/10), et al. or state variation thereof.



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Project Name/Number: AST Quantitative Modeling Portfolio At a Glance/0198237-00001-00

Supporting Document Schedules

Item Status:

Status

Date:

Satisfied - Item: Cover Letter

Comments:

Attachment:

0198237-00001-00 AR Pruco LB.pdf



Louis Bunosso
Manager, Compliance

Prudential Annuities
One Corporate Drive
Shelton, CT 06484
Tel (203) 944-7522

April 19, 2011

Arkansas Department of Insurance
1200 West Third Street
Little Rock, AR 72201-1904

Re: **Advertising Materials:**
Pruco Life Insurance Co. NAIC #79227

To Whom It May Concern:

On behalf of Pruco Life Insurance Co, wholly owned subsidiary of The Prudential Insurance Company of America, and pursuant to applicable State requirements, I am enclosing the following advertising material(s):

Control #	Material Title
0198237-00001-00	AST Quantitative Modeling Portfolio At a Glance]

Please let me know if you require any additional information.

Sincerely,

Louis Bunosso
Manager, Compliance

Encl.