

**State:** Arkansas      **Filing Company:** The Variable Annuity Life Insurance Company  
**TOI/Sub-TOI:** A02G Group Annuities - Deferred Non-variable/A02G.002 Flexible Premium  
**Product Name:** GMIR-12  
**Project Name/Number:** GMIR-12/GMIR-12

## Filing at a Glance

Company: The Variable Annuity Life Insurance Company  
Product Name: GMIR-12  
State: Arkansas  
TOI: A02G Group Annuities - Deferred Non-variable  
Sub-TOI: A02G.002 Flexible Premium  
Filing Type: Form  
Date Submitted: 07/11/2012  
SERFF Tr Num: AGNN-128562045  
SERFF Status: Closed-Approved-Closed  
State Tr Num:  
State Status: Approved-Closed  
Co Tr Num: GMIR-12

Implementation  
Date Requested:  
Author(s): Valerie Garcia  
Reviewer(s): Linda Bird (primary)  
Disposition Date: 07/13/2012  
Disposition Status: Approved-Closed  
Implementation Date:

State Filing Description:

<b>SERFF Tracking #:</b>	AGNN-128562045	<b>State Tracking #:</b>	<b>Company Tracking #:</b> GMIR-12
<b>State:</b>	Arkansas	<b>Filing Company:</b>	The Variable Annuity Life Insurance Company
<b>TOI/Sub-TOI:</b>	A02G Group Annuities - Deferred Non-variable/A02G.002 Flexible Premium		
<b>Product Name:</b>	GMIR-12		
<b>Project Name/Number:</b>	GMIR-12/GMIR-12		

## General Information

Project Name: GMIR-12	Status of Filing in Domicile: Not Filed
Project Number: GMIR-12	Date Approved in Domicile:
Requested Filing Mode:	Domicile Status Comments: Not yet filed.
Explanation for Combination/Other:	Market Type: Group
Submission Type: New Submission	Group Market Size: Small and Large
Group Market Type: Employer	Overall Rate Impact:
Filing Status Changed: 07/13/2012	
State Status Changed: 07/13/2012	Deemer Date:
Created By: Valerie Garcia	Submitted By: Valerie Garcia
Corresponding Filing Tracking Number:	

### Filing Description:

Enclosed for your review and approval is endorsement form GMIR-12. This endorsement will attach to the Company's previously approved fixed group unallocated annuity contract and will lower the guaranteed minimum interest rate to 1.0% for newly issued contracts only. Specifically, the endorsement will attach to contract GFUA-398 (approved by your department on 03/31/1998). Existing contracts holders will continue to receive at least a 1.5% minimum guaranteed interest rate or such higher guaranteed rate set forth in their contracts. We certify that we are in compliance with Regulations 19 and 49 as well as AR Code Ann. 23-79-138.

The Company filed a previous version of this endorsement in 2003. This prior version, which was approved on 07/23/2003, lowered the guaranteed minimum interest rate to 1.5% on the underlying contract. If rates were to rise in the future, the Company would like the flexibility to discontinue using the new version (GMIR-12) and begin using the version previously approved (GMIR-603), which offers a slightly higher rate of 1.5%. Therefore, we do not want to replace the previous version, but would like to have both available.

The filing of the endorsement is made in response to the country's continued and unprecedented low interest rate environment. Yields on fixed investments have remained in decline throughout the past year which has exposed annuity carriers like the Company to a problem with spreads between what they can earn on their investments and the minimum rates they must contractually guarantee under their fixed annuity products. By lowering the guaranteed minimum interest rate to at least 1.0%, the endorsement will thus help to ensure that the Company will be able to continue to offer viable fixed annuity products to consumers in your state. The Company will not decrease the minimum guaranteed interest rate below 1.0%.

The endorsement will become a part of all new contracts issued and upon policy form reprint, the terms of the endorsement may be incorporated into each form. If you have any questions or need additional information, please call me at 1-800-262-4764, x8313702 or email me at [valerie.garcia@valic.com](mailto:valerie.garcia@valic.com).

Sincerely,

Valerie Garcia – Associate Legal Analyst

## Company and Contact

### Filing Contact Information

Valerie Garcia, 2919 Allen Pkwy L10-30 Houston, TX 77019	<a href="mailto:Valerie.Garcia@valic.com">Valerie.Garcia@valic.com</a> 713-831-3702 [Phone]
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TOI/Sub-TOI: A02G Group Annuities - Deferred Non-variable/A02G.002 Flexible Premium

Product Name: GMIR-12

Project Name/Number: GMIR-12/GMIR-12

Filing Company Information

The Variable Annuity Life Insurance Company
2929 Allen Parkway, L10-30
Houston, TX 77019
(713) 831-1305 ext. [Phone]

CoCode: 70238
Group Code: 12
Group Name:
FEIN Number: 74-1625348

State of Domicile: Texas
Company Type:
State ID Number:

Filing Fees

Fee Required? Yes
Fee Amount: \$100.00
Retaliatory? Yes
Fee Explanation:
Per Company: No

Table with 4 columns: Company, Amount, Date Processed, Transaction #. Row 1: The Variable Annuity Life Insurance Company, \$100.00, 07/11/2012, 60818125

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## Correspondence Summary

### Dispositions

Status	Created By	Created On	Date Submitted
Approved-Closed	Linda Bird	07/13/2012	07/13/2012

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## Disposition

Disposition Date: 07/13/2012

Implementation Date:

Status: Approved-Closed

Comment:

Rate data does NOT apply to filing.

Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Flesch Certification		Yes
Supporting Document	Application		No
Supporting Document	Life & Annuity - Acturial Memo		No
Supporting Document	SOV		Yes
Form	Endorsement		Yes

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## Form Schedule

Lead Form Number: GMIR-12							
Item No.	Schedule Item Status	Form Number	Form Type	Form Name	Action/Action Specific Data	Readability Score	Attachments
1		GMIR-12	CERA	Endorsement	Initial:	50.000	GMIR-12_filedversion.pdf

### Form Type Legend:

<b>ADV</b>	Advertising	<b>AEF</b>	Application/Enrollment Form
<b>CER</b>	Certificate	<b>CERA</b>	Certificate Amendment, Insert Page, Endorsement or Rider
<b>DDP</b>	Data/Declaration Pages	<b>FND</b>	Funding Agreement (Annuity, Individual and Group)
<b>MTX</b>	Matrix	<b>NOC</b>	Notice of Coverage
<b>OTH</b>	Other	<b>OUT</b>	Outline of Coverage
<b>PJK</b>	Policy Jacket	<b>POL</b>	Policy/Contract/Fraternal Certificate
<b>POLA</b>	Policy/Contract/Fraternal Certificate: Amendment, Insert Page, Endorsement or Rider	<b>SCH</b>	Schedule Pages

**THE VARIABLE ANNUITY LIFE INSURANCE COMPANY**  
**(the "Company")**  
**[2929 Allen Parkway**  
**Houston, Texas 77019]**

**ENDORSEMENT**

This Endorsement is made a part of the group annuity contract (including any contract schedule page) to which it is attached (the "Contract"). This Endorsement shall supersede any inconsistent provisions of the Contract or any endorsement issued prior to or concurrent with this Endorsement. This Endorsement amends the Contract as follows:

Notwithstanding anything in your Contract to the contrary, while this Contract is in effect, the Contract to which this Endorsement is attached shall guarantee a minimum interest rate of 1.0% per year that will be:

- (i) credited to the fixed interest options during the accumulation period;
- (ii) used to limit a negative Market Value Adjustment (if applicable) under any fixed-interest option under the Contract (or any endorsement to the contract).

The provisions of this Endorsement shall be effective on the Contract date of issue.

**THE VARIABLE ANNUITY LIFE**  
**INSURANCE COMPANY**

[  ]

[Secretary]

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## Supporting Document Schedules

		Item Status:	Status Date:
Satisfied - Item:	Flesch Certification		
Comments:			
Attachment(s):			
FLESCH.pdf			

		Item Status:	Status Date:
Bypassed - Item:	Application		
Bypass Reason:	N/A		
Comments:			

		Item Status:	Status Date:
Satisfied - Item:	SOV		
Comments:			
Attachment(s):			
GMIR-12_SOV.pdf			

## CERTIFICATION

THE VARIABLE ANNUITY LIFE INSURANCE COMPANY, NAIC #70238, hereby certifies that the following form(s) comply with the Flesch scale of readability requirements of your State and the form(s) achieve the following score:

<u>Form Number</u>	<u>Form Description</u>	<u>Flesch Score</u>
GMIR-12	Endorsement	50



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Tracey Harris  
Vice President

07.11.2012  
Date

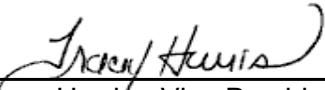
**The Variable Annuity Life Insurance Company**

**Statement of Variability for Forms:**

**GMIR-12**

**Date: July 10, 2012**

- For administrative purposes, the company address is bracketed.
- For administrative purposes, the Officer signatures are bracketed.

  
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Tracey Harris - Vice President  
The Variable Annuity Life Insurance Company