



Taking Advantage of Rising Rates

Interest rates are at historic lows, which means we may see a rise in interest rates in the future. If your clients expect short-term interest rates to rise, and are concerned about their future purchasing power, ING's Interest Rate Benchmark Strategy may help them take advantage of a rising interest rate environment. The Interest Rate Benchmark Strategy is available with the ING Secure line of fixed index annuities from ING USA Annuity and Life Insurance Company.

How will your client's retirement dollars perform as interest rates rise?

For many clients, retirement goals are simple -- to accumulate enough money to retire the way they want. Most people want to maintain their current lifestyle after they retire. And in the face of challenges like inflation, market risk, and living longer, it's important to plan carefully.

There are many equity strategies available to help save for retirement. The Interest Rate Benchmark Strategy gives your clients another way to potentially boost their savings by basing interest credits on the increase in interest rates over a one-year period. This means that regardless of what the equity markets do in a given year, if interest rates rise, the Interest Rate Benchmark Strategy may offer competitive results. Here we illustrate two periods of rising rates that demonstrate the opportunity the ING Interest Rate Benchmark Strategy may provide in a similar environment.

Fixed index annuities are insurance contracts that, depending on the contract, may offer a guaranteed annual interest rate and earnings potential that is linked to participation in the growth, if any, of an index or benchmark.

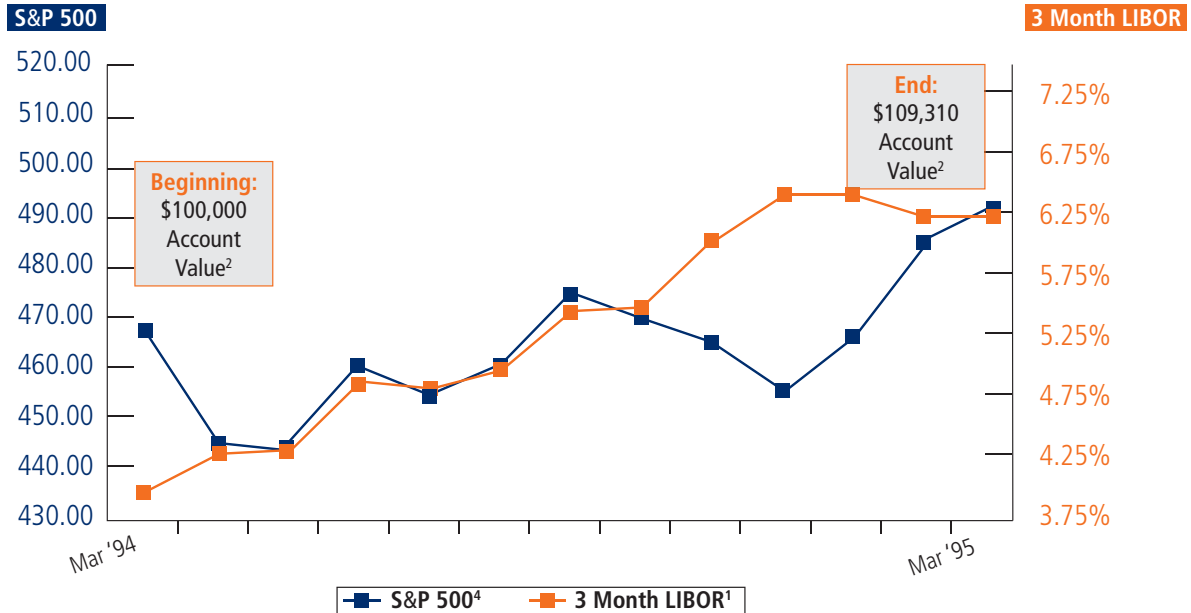
The ING Secure line of fixed index annuities:

- > Provides minimum guarantees and interest potential.
- > Lets your client choose from among five interest crediting strategies and a fixed rate strategy. Each strategy credits potential interest to the annuity value differently.
- > Gives your clients an optional benefit that provides an income stream in retirement. The ING IncomeProtector Withdrawal Benefit (for an additional cost) can help provide and protect your client's current and future retirement needs.

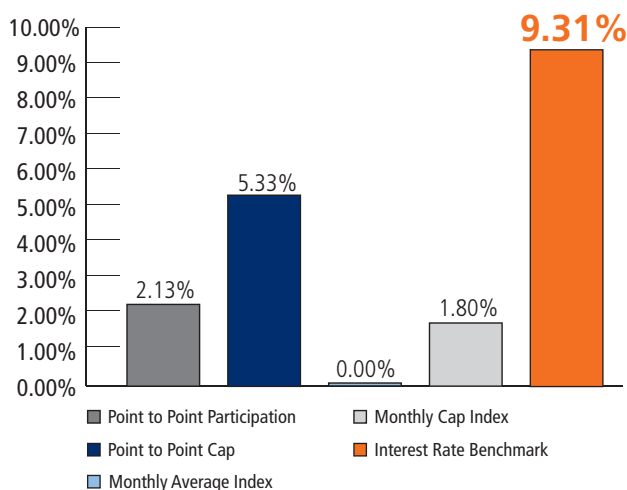


Interest Rate Benchmark Strategy 1994-1995

This graph illustrates the 3-Month London Interbank Offered Rate (LIBOR) and the S&P 500 Index during the one-year period from March 1994 through March 1995³. The 3-Month LIBOR increased dramatically during this time. The S&P 500 Index returned 5.19%. Interest rates and equity markets rise and fall independently of one another. Hypothetically, by allocating \$100,000 to the Interest Rate Benchmark Strategy, the contract's accumulation value increased to \$109,310.



How would the Interest Rate Benchmark Strategy have performed compared to the Index Strategies offered for the same period?



How it Works

$$\left(\text{Ending LIBOR Rate} - \text{Beginning LIBOR Rate} \right) \times \text{Participation Multiplier} = \text{Credited Rate (subject to cap)}$$

$$(6.27\% - 3.94\%) \times 4 = 9.31\%$$

$$9.31\% < 10.00\% \quad \text{Compare potential Credited Rate to Credit Cap}$$

Assumptions: Fixed Rate Strategy interest rate of 2.00%, Participation Rate of 40%, Index Cap of 8.00%, Index Spread of 4.00%, Monthly Index Cap of 2.30%, Interest Rate Benchmark Multiplier of 4, and Interest Rate Benchmark Credit Cap of 10.00%.

¹ The 3-Month LIBOR rates are the monthly averages for the specified month

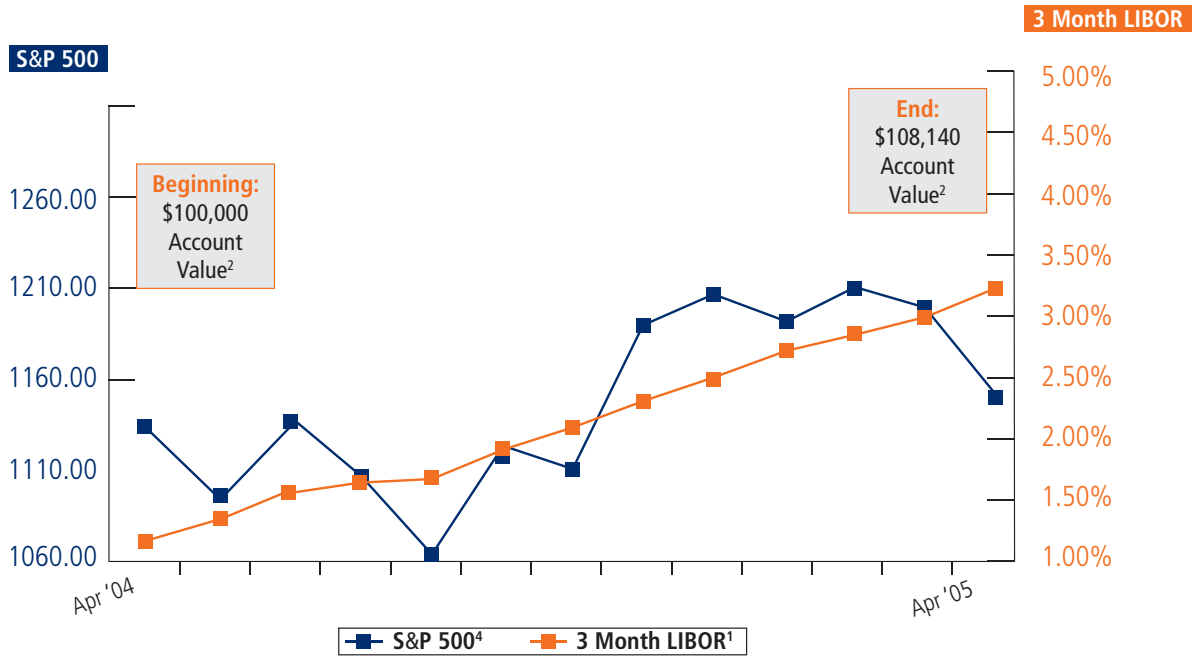
² AV based on 100% allocation to Interest Rate Benchmark Strategy

³ Historical interest rates for the 3-Month LIBOR should not be considered a representation of current or future interest rates or of your annuity. Historical performance of the S&P 500® Index should not be considered a representation of current or future performance of the Index or of your annuity. This unmanaged index is not intended to represent a specific investment. Investors cannot invest directly in an index. Since this product was not available in 1994-1995, performance is based on hypothetical past performance only and is not an indication of current or future results. This example assumes no withdrawals were made and is an example only. This strategy is designed to provide a credit in the event that short term interest rates rise over the interest rate benchmark period. If short term interest rates remain level or decrease over the interest rate benchmark period, this strategy will not provide a credit.

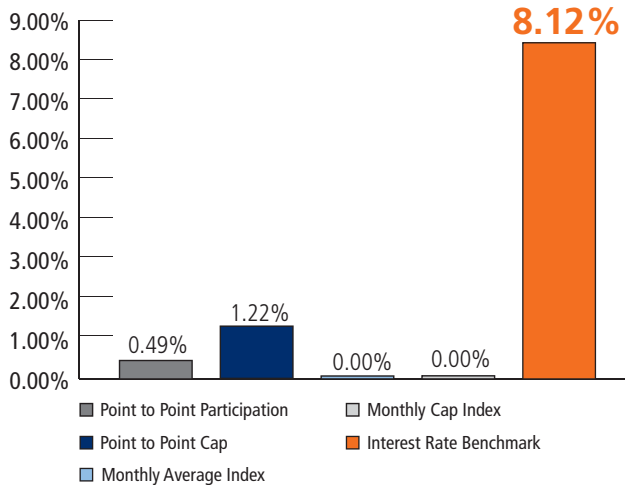
⁴ The S&P 500 values are for the 15th of the month for the specified period.

Interest Rate Benchmark Strategy 2004-2005

This graph illustrates the 3-Month LIBOR and the S&P 500 Index during the one-year period from April 2004 through April 2005³. The 3-Month LIBOR increased dramatically during this time. The S&P 500 Index returned 1.22%. Interest rates and equity markets rise and fall independently of one another. Hypothetically, by allocating \$100,000 to the Interest Rate Benchmark Strategy, the contract's accumulation increased to \$108,140.



How would the Interest Rate Benchmark Strategy have performed compared to the Index Strategies offered for the same period?



How it Works

$$\left(\text{Ending LIBOR Rate} - \text{Beginning LIBOR Rate} \right) \times \text{Participation Multiplier} = \text{Credited Rate (subject to cap)}$$

$$(3.21\% - 1.18\%) \times 4 = 8.12\%$$

8.12% < 10.00% Compare potential Credited Rate to Credit Cap

Assumptions: Fixed Rate Strategy interest rate of 2.0%, Participation Rate of 40%, Index Cap of 8.00%, Index Spread of 4.00%, Monthly Index Cap of 2.30%, Interest Rate Benchmark Multiplier of 4, and Interest Rate Benchmark Credit Cap of 10.00%.

¹ The 3-Month LIBOR rates are the monthly averages for the specified month

² AV based on 100% allocation to Interest Rate Benchmark Strategy

³ Historical interest rates for the 3-Month LIBOR should not be considered a representation of current or future interest rates or of your annuity. Historical performance of the S&P 500® Index should not be considered a representation of current or future performance of the Index or of your annuity. This unmanaged index is not intended to represent a specific investment. Investors cannot invest directly in an index. Since this product was not available in 2004-2005, performance is based on hypothetical past performance only and is not an indication of current or future results. This example assumes no withdrawals were made and is an example only. This strategy is designed to provide a credit in the event that short term interest rates rise over the interest rate benchmark period. If short term interest rates remain level or decrease over the interest rate benchmark period, this strategy will not provide a credit.

⁴ The S&P 500 values are for the 15th of the month for the specified period.

**ING USA Annuity and
Life Insurance Company**

909 Locust Street
Des Moines, IA 50309

Annuities are issued by ING USA Annuity and Life Insurance Company, (Des Moines, IA), member of the ING family of companies.

Fixed index annuities are insurance contracts that, depending on the contract, may offer a guaranteed annual interest rate and earnings potential that is linked to participation in the increase, if any, of an index or benchmark. All guarantees are based on the financial strength and claims paying ability of ING USA Annuity and Life Insurance Company, who is solely responsible for all obligations under its policies.

In consideration for BBA LIBOR Limited ("BBALL") coordinating and the BBA LIBOR Contributor Banks and Reuters (the "Suppliers") supplying the data from which BBA LIBOR is compiled, the subscriber acknowledges and agrees that, to the fullest extent permitted by law, none of BBALL or the Suppliers:- (1) accept any responsibility or liability for the frequency of provision and accuracy of the BBA LIBOR rate or any use made of the BBA LIBOR rate by the subscriber, whether or not arising from the negligence of any of BBALL or the Suppliers; or (2) shall be liable for any loss of business or profits nor any direct, indirect or consequential loss or damage resulting from any such irregularity, inaccuracy or use of the Information.

"Standard & Poor's®", "S&P®", "S&P 500®", "Standard & Poor's 500", and "500" are trademarks of The McGraw-Hill Companies, Inc. and have been licensed for use by ING USA Annuity and Life Insurance Company. The Product is not sponsored, endorsed, sold or promoted by Standard & Poor's and Standard & Poor's makes no representation regarding the advisability of investing in the Product. The S&P 500 Index does not reflect dividends paid on the underlying stock. These unmanaged indexes are not intended to represent specific investments. Investors cannot invest directly in an index. Past performance is no guarantee of future results.

© 2011 ING North America Insurance Corporation
cn67715082013

