



Douglas E. Scully
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August 29, 2017

Sonny Oh, Esq.
Office of Insurance Products
Division of Investment Management
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549

RE: Pruco Life Insurance Company ("Registrant")
Registration Statements on Form S-3

Dear Mr. Oh:

As requested, I represent that the disclosures included in the following Form S-3 registration statements do not make any material change to existing disclosures. As such, if these Form S-3 registrations pertained to a registered investment company subject to rule 485 under the Securities Act of 1933, they would be eligible for filing under Rule 485(b).

File No. 333-220097
File No. 333-220099
File No. 333-220116
File No. 333-220118

Please call me at (203) 925-6960 if you have any questions.

Very truly yours,

/s/Douglas E. Scully.
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