

**COMMENT #1: OCOBER 16, 2008**

From: Craig\_Cox@aigag.com [[mailto:Craig\\_Cox@aigag.com](mailto:Craig_Cox@aigag.com)]  
Sent: Thursday, October 16, 2008 12:34 PM  
To: ASB Comments  
Subject: REPEAL OF ASOP NO. 31

I do not believe that ASOP No. 31 should be repealed. I agree that parts of other ASOP's contain some similar guidance. However, they only contain pieces. I think that having to create a grid that references 7 other ASOP's in order to show where that guidance is located argues against repeal.

Given that 7 other ASOP's had to be referenced, ASOP No. 31 obviously contains information that is put together in a unique way.

Further, if you just look at the comparison of the current section 3.1 to the cross referenced ASOP No 41 (3.1, 3.3.3), ASOP No. 31 references credibility considerations and trend procedures. These are not mentioned in ASOP No. 41.

L. Craig Cox, FSA, MAAA  
Director - Accident & Health  
American General Life Companies  
(713) 831-3626  
(832) 657-4056 Mobile  
(713) 620-3107 Fax