

COMMENT 3: DECEMBER 29, 2008

From: Miksch, Margaret

Sent: Monday, December 29, 2008 9:38 PM

To: ASB Comments

Subject: Proposed Repeal of ASOP No. 31

General Comments: I believe that ASOP No. 31, as it is, is an excellent guide to the specific task of documenting the ratemaking process for health benefit plans and should not be repealed.

Specific comments on appendix: The grid in the Appendix of the proposed Repeal would actually be a good addition, as an Appendix, to the current version of ASOP 31.

ASOP 41 and the other ASOPs cross-referenced in this grid are themselves valuable resources for the documentation process. But personally, I would find it distracting and confusing, as well as frustrating, to try to successfully follow the guidance of a series of sections from a series of different ASOPs without the total process being summarized in its own ASOP. Keeping ASOP 31, and adding to it the Appendix in the current Proposed Repeal, would result in an even more complete guidance to health benefit plan ratemaking documentation than is available now.