

## **COMMENT 7: DECEMBER 30, 2008**

**From:** Marler, Carol (GE, Corporate)  
**Sent:** Tuesday, December 30, 2008 1:40 PM  
**To:** ASB Comments  
**Subject:** ASB COMMENTS

The following comments are my personal opinions, and do not necessarily represent the position of my employer.

Thank you for the opportunity to comment on Actuarial Standard of Practice (ASOP) Content and ASB Procedure.

1. Appropriate level of guidance. I believe that the ASOPs provide an appropriate level of guidance.
2. Degree of specificity in guidance. I believe that actuaries should be given the opportunity to exercise professional judgment. I do not feel that the ASOPs need to be more prescriptive.
3. Clarity of ASOPs. I find them to be generally clear and unambiguous.
4. Exposure draft comment period. I would echo those who feel that a period of 60 to 90 days is adequate. However, a better method for informing actuaries of new exposure drafts is essential. For example, I received in early December a copy of the fall issue of the *ASB Boxscore*. This was the first notice I received of the exposure draft of revised ASOP No. 41. Thus the intended 90 day period was, as a practical matter, reduced to less than 30 day.

Perhaps it would be appropriate to send out an electronic notification to members of the Academy each month, listing all exposure drafts made available in that month.

I must say that in this particular instance, the “snail mail” notification method was definitely not adequate.

5. Obtaining adequate number of representative comments. I have on several occasions in the past submitted comments on drafts. It is always heartening to see some or all of my comments implemented, resulting in an improved document. I do think, however, that many busy actuaries are not going to find it time-effective to respond to a draft that seems satisfactory to them. And I must admit that the phrase “oppose certain wording” strikes the wrong chord with me. Constructive criticism ought to be the goal of the commentators, and their remarks ought to be taken in precisely this sense.

I have two suggestions on how to encourage more actuaries and interested parties to comment.

First, as noted above, notification by electronic methods might allow interested parties the full time period specified for exposure.

Second, a list of questions, such as these, can be helpful in getting positive responses as well as negative ones.

6. ASB responses to comments. I have been quite satisfied with the way the ASB responds to comments.

7. Reliance under ASOPs. I believe that the existing guidance is adequate.

8. Concepts of other disciplines. To the extent that actuarial judgment can be made more effective by using these concepts, I favor including them. When consensus has not been reached, this disagreement should be disclosed in the ASOP.

9. Litigation risk. I have no particular opinion on this issue.

10. Other suggestions. I have no further comments.

Associate Actuary Employers Reassurance Corporation