

Comment #12 – 1/16/12 – 5:24 p.m.

ASOP No. 38 Revision
Actuarial Standards Board
1850 M Street, Suite 300
Washington, DC 20036

I am responding to the request for comments on the exposure draft of the proposed revisions to ASOP 38.

The response by Amy P. Angell, signed by several others at Milliman, does an excellent job of identifying issues with the proposed revisions to ASOP 38. I do not believe the intent is to set the bar nearly as high as implied by her concerns, but the ASOP should not leave members wondering what they must do to comply.

Rather than be repetitive, I encourage the Task Force to carefully consider each of the issues raised by Amy, engage the membership in discussions, and make appropriate revisions. The issues are substantive enough that more discussion is needed. Therefore, I do not support the draft as currently proposed.

Thank you for your service and for taking time to make appropriate changes as a result of member comments.

Sincerely,

Greg Hayward, FCAS, FCIA, MAAA, CPCU

And the following two members:

Kathleen Pechan, FCAS, MAAA

Tobe Bradley, FCAS, MAAA