## Comment #2 – 3/1/11- 4:42 p.m.

Specific Comments on Draft:

Page Comment(s)

4 Second line of Section 3.5.1 <u>Data</u> should read "include consumer price indicies, the..."

5 The last sentence in the one full paragraph at the end of Section 3.6.1 is obsolete as the notion of "ranges" has been dropped.

With regard to the Interrogatories on Page x of the Draft, I am in complete agreement except for ?4. Arithmetic returns have no place in ASOP No. 27.

Sincerely,

Juan N. Kelly, A.S.A., E.A., M.A.A.A. Senior Actuarial Advisor Mahoney & Associates Creative Compensation & Benefits Solutions