

Comment #35 – 9/30/13 – 1:52 p.m.

Thank you for the opportunity to comment on the proposed Modeling ASOP. I appreciate the work that was done by the Task Force on it.

I do have some concerns with the draft as written that I would like to comment on.

1) It feels to me that the scope of the draft is too broad, including the definition of model itself. Some of the terminology used in the draft feels too slanted toward financial models--and while the concepts can apply more broadly, the differences of terminology are difficult to reconcile. It may be more effective to have modeling ASOPs more focused by P&C vs. Life, etc. even if there is consistency among them with common concepts. By having such a broad scope, the draft needs to be written rather generally, which while having room for judgment is critical, if written too general can be an issue and not provide the intended guidance.

2) The definition of model in the draft feels much too broad for what I would assume is the intent of the draft. Again, this may stem partly from the broad scope of the draft. Having the draft stress more strongly the need for (substantial) materiality of a model for it to apply may also help.

3) The draft may also benefit from addressing the different requirements for model users vs. model builders--if there is an intended difference in the draft--since as written there are numerous requirements being placed on model users that would not add value.

4) I agree with Tobias E. Bradley's comments regarding the differences of model validation vs. model verification. There may be value in having the draft ASOP focus more on those issues instead of taking the broad scope of the current form.

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