

Comment #1 – 7/2/13-4:53 p.m.

After briefly reviewing the exposure draft on modeling, my immediate comment is that the use of bold font to identify defined terms is extremely distracting and unhelpful. I would instead suggest using a different, less ornate, font for those defined terms, as illustrated in the attachment. For example, if the main document were in Times New Roman 12pt, putting the defined terms in Arial 11pt (regular, not bold) would have the desired effect, in my opinion.

Exposure Draft

Given the wide use of **models** in actuarial practice, there may be less significant instances, such as those involving minimal reliance by the user, or resulting in a minimal financial effect, where some guidance described in this ASOP is not appropriate or practical, as discussed in section 3.1. For example, the **specifications**, development, documentation, and controls for **models** used in less critical situations may not need to be as rigorous as stated in this ASOP because the ASOP's guidance might not be practical or appropriate for the **intended application** of the **model** or the **project's objective**.

Proposed Alternative

Given the wide use of models in actuarial practice, there may be less significant instances, such as those involving minimal reliance by the user, or resulting in a minimal financial effect, where some guidance described in this ASOP is not appropriate or practical, as discussed in section 3.1. For example, the specifications, development, documentation, and controls for models used in less critical situations may not need to be as rigorous as stated in this ASOP because the ASOP's guidance might not be practical or appropriate for the intended application of the model or the project's objective.

Rowen B. Bell, FSA, MAAA

Senior Actuary, Corporate Actuarial

Aetna