

Comment #16 – 12/15/14- 7:14 p.m.

1. Would an ASOP on life insurance and annuity pricing be beneficial to the profession?

Yes, although complying with the ASOP should not be so burdensome as to outweigh any benefits provided. Also, management adjustments should be in scope, otherwise the proposed pricing ASOP loses much of its value.

2. Are there areas where appropriate practice needs to be defined or current practice needs to be improved? If so, what are those areas?

3. Does the proposed ASOP cover the appropriate subject areas? If not, what changes do you suggest?

Yes, it covers the most important subject areas.

4. How should the proposed ASOP interact with existing ASOPs that provide guidance regarding policyholder dividends and other nonguaranteed elements?

The proposed ASOP should not force changes to current ASOPs.

Respectfully submitted,

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