

Comment #5 - 10/24/14 – 4:38 p.m.

Please see my response to the questions below –

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

Yes. It would be helpful to have one ASOP so that guidance could be centralized.

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? **I believe the appropriate subject areas are covered.**

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

Thank you for encouraging the actuarial profession to comment on this and other important topics.

Sincerely,

Kelly McKeethan, FCAS, MAAA, CERA