

**Comment #7 – 11/20/14 – 12:18 p.m.**

The following is MassMutual's response to the questions posed in the ASB email sent October 7<sup>th</sup>:

1. **Would an ASOP on life insurance and annuity pricing be beneficial to the profession?** Yes, provided it properly captures the wide range of practices within the US and does not appear to favor one practice over another practice without having strong, unassailable reasons to do so (e.g., it shouldn't appear to favor stochastic risk analysis over deterministic risk analysis or economic capital over NAIC RBC).
2. **Are there areas where appropriate practice needs to be defined or current practice needs to be improved? If so, what are those areas?** There may be opportunities to provide more detailed standards and guidance on areas such as documentation, disclosures, and controls. The Academy should be very hesitant about trying to "improve" areas where there is appropriately a wide range of industry practices, largely driven by the wide range of products and life insurers within the US.
3. **Does the proposed ASOP cover the appropriate subject areas? If not, what changes do you suggest?** Yes, it appears you have a complete list of areas.
4. **How should the proposed ASOP interact with existing ASOPs that provide guidance regarding policyholder dividends and other nonguaranteed elements?** We are assuming you are already planning to say pricing and repricing activities should be performed in full compliance with the other ASOP's. We are not sure at this point what else should be said about the interactions with other ASOP's.

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