

Comment #13 – 2/19/16 – 11:47 a.m.

1. Under 1.2, the scope is somewhat unclear. Suggest rewording the second sentence: "If any actuary prepares data, *or assumes responsibility for preparing data*, to be used by other actuaries in an actuarial work product, the actuary should..." [emphasis added for clarity, not for final version]. Otherwise, the scope of the italicized clause becomes very broad (because it is not limited in the original wording to support of another actuary's work).

2. I think the next sentence is very general -- it would benefit from a description or definition of exactly what (in the context of the ASOP) constitutes a "wholly hypothetical data set." After all, nearly all hypothetical data is in some way based on real data, which should then be covered by this ASOP, but might be deemed exempt based on this sentence.

3. I suggest deleting the following sentence (about audit), since it is redundant to 3.7.c and does not appear to warrant such prominent mention under Scope.

4. Although I realize it is lifted from the prior version, I feel the most important definition in the ASOP (that of Data) is very weak and would greatly benefit from a thorough reworking before the next version is produced. Although I do not have any specific suggestions, I would say in the way of example that qualitative information very often is data, especially in this age of Big Data, text mining and the like.

5. Along the same lines, the prominent distinction drawn between data and "information", especially in the preceding definition and in Section 3.6, leads me to suggest that a definition be added for Information.

6. In Section 4.1 (heading paragraph), the sentence "In addition, the actuary should disclose the following items" is problematic. Placed as it is at the end of that paragraph, it states that every item (a) through (j) needs to be disclosed in every actuarial opinion (written or oral), regardless of the provisions of ASOP 41. I don't think that such a broad requirement was intended. Two suggestions (my thought is that both are needed):

a. Bring that sentence under the scope of ASOP 41, so such disclosures need not be made not universally, but as directed by the guidance provided in ASOP 41.

b. Make it more clear that any one of the individual elements of (a) through (j) need be included in the disclosure only when it is relevant to the opinion at hand.

7. I suggest deleting 4.1.h, 4.1.i, and 4.1.j. At the head of Section 4, the actuary has already been explicitly directed to ASOP 41, rendering these bullets superfluous.

Thank you for the opportunity to render these comments.

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