

February 26, 2016

Actuarial Standards Board
1850 M Suite NW, Suite 300
Washington, DC 20036

This letter is the response of Willis Towers Watson to the Exposure Draft ("ED") of the Proposed Revision of Actuarial Standard of Practice ("ASOP") No. 23 – Data Quality. Willis Towers Watson is a global professional services firm that helps organizations improve performance through effective people, risk and financial management. Willis Towers Watson has approximately 39,000 employees on a worldwide basis, over 1,100 of whom are members of U.S. actuarial bodies subject to the standard. The undersigned have prepared our company's response with input from others in the Company.

The request for comments asked three questions:

1. Does this proposed revision provide appropriate guidance for an actuary preparing data for another actuary's use (for example, legislatively-mandated data submissions)?
2. Does this proposed revision provide appropriate guidance for working with nontraditional data sources (for example, predictive models)?
3. Considering the guidance in section 3.6, which discusses the quality of other information relevant to data, is the title of the standard "Data Quality" appropriate?

We find the answer to all three of these questions is "Yes".

We have one other comment. Both 3.1 and 3.4 observe that "appropriate data that are accurate and complete may not be available". It is not clear to us what the Standard means by the term "available". There are instances where the acquisition of appropriate, complete, and accurate data entails significant time and expense that may not be practical or reasonable. In other circumstances the data is indeed available, but for various reasons (such as unreasonable time constraints) the actuary may not yet have obtained it. In the first circumstance, we feel the actuary should not be expected to require an employer or client to make unreasonable investments of time and/or money to obtain such data if less complete and/or less accurate (but still appropriate) data is available. In the second circumstance the Standard should not be written in a way to allow actuaries to use data in their possession that may not be appropriate (as defined in the ED) when appropriate (and possibly complete and accurate) data is available but the actuary just has not obtained it, yet.. In this second circumstance the Standard should be clear that the actuary has a professional obligation to seek the appropriate data.

Perhaps the Standard should make it clear that "available" refers to practicality and the reasonableness of the effort required to obtain it. 3.4.b. addresses this somewhat, but we wanted to bring this to the attention of the ASB Committee.

Thank you for this opportunity to comment on the ED. If you have any questions concerning our comments, please contact either of us directly.



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