

Comment #17 – 4/30/16 – 5:07 p.m.

Thank you for the opportunity to comment on the second exposure draft of the PC Ratemaking ASOP exposure draft. It is my understanding that the CAS may discontinue the CAS statement of principles. I have relied upon the 4 ratemaking principles from this document on several occasions. I would like to see these principles retained in this ASOP or placed as appropriate in another ASOP.

In addition, in section 3.7.3 additional adjustments to historical data, I suggest that item e. be broader than operational change ~~that impact expenses~~. The other items are not as specific.

One other comment I have is I think the reference to “company’s” decisions in determining price in the scope section should be broader than just company’s decisions. Perhaps removing this reference.

I think the proposed ASOP is consistent with existing practice.

Thank you again for the work of those involved with the exposure draft.

Sincerely ,

Steve Harr FCAS, FCIA, MAAA
AVP and Actuary
State Farm Insurance