Comment #4 – 7/27/16 – 6:42 p.m.

Below are my comments on the life pricing ASOP:

1. Does the draft ASOP provide appropriate guidance to the actuary when providing actuarial services related to the pricing of life insurance and annuity products? Yes. However I would suggest adding something stating that the actuary should use assumptions that are reasonable.

2. Given the range of roles actuaries may have in the pricing of life insurance and annuity products, is the scope of the draft ASOP appropriate? Generally yes, but I notice that design is within scope but there really isn’t any guidance on design related work.

3. Does the draft ASOP address the range of products and pricing methodologies used in the industry? I believe so.

4. Are the disclosures required in section 4 appropriate? Yes, however while there is a cross reference to ASOP 41 related to documentation, I would suggest adding one related to disclosures. The ASOP 41 disclosures would of course apply, but a reminder would be helpful.

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