



Comments on the Second Exposure Draft on Assessment and Disclosure of Risk Associated with Measuring Pension Obligations and Determining Pension Plan Contributions

October 31, 2016

The Actuarial Standards Board

The ASPPA College of Pension Actuaries (ACOPA) appreciate this opportunity to comment on the Second Exposure Draft of the Proposed Actuarial Standard of Practice on Assessment and Disclosure of Risk Associated with Measuring Pension Obligations and Determining Pension Plan Contributions (Risk ASOP). ACOPA's comments are prepared by actuaries who work primarily on small to mid-sized pension plans, including plans in which a significant portion of the pension obligation is attributable to principal employees.

ACOPA appreciates the consideration the Actuarial Standards Board (ASB) Pension Committee gave to comments we submitted in May, 2015 on the previous exposure draft. We find that concerns raised in those comments have been addressed in this second exposure draft, and are not suggesting additional modifications. ACOPA commends the ASB for the outstanding work that has gone into the development of this Risk ASOP.

This letter was prepared by a task force of ACOPA's Professionalism Committee, chaired by Lynn M. Young, MSPA. If you have any questions, please contact Judy Miller, Executive Director of ACOPA, at (703) 516-9300 ext. 152 or jmiller@usaretirement.org.

Sincerely,

/s/

Kurt F. Piper, FSPA, President
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/s/

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/s/

William G. Karbon, MSPA, President-Elect
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/s/

Lynn M. Young, MSPA, Chair
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