I am providing a comment on the proposed Capital Adequacy Assessment for Insurers ASOP. This comment is on my behalf and does not necessarily reflect the perspective of my employer.

3.6.2 Level of Adversity

In what I believe is intended to be a description of increasing levels of adversity, I found b and c confusing. While “extremely unlikely” in c is definitely a higher level of adversity than “plausible” in b, I believe the words “catastrophic events” in b are much worse than the words “adverse conditions” in c. So…I recommend the wording be changed to:

b. plausible adverse conditions, and

c. extremely unlikely catastrophic events.

That’s my only comment. Thanks for the opportunity to comment.