

Comment #5 – 12/9/16 – 2:34 p.m.

Section 2 (Definitions)

I would suggest adding a definition of “Methodology”.

If it refers to things like pricing, financial projections for management, actuarial appraisals or valuations (e.g., VM-20 reserves), then maybe “Purpose” would be a better descriptor than “Methodology”.

Section 3.1.2 (Adjustments for Data Deficiencies)

I did not understand what you were driving at here. If data is deficient (which it can be for many reasons), I would think you have to make some adjustments or even toss the data altogether if it is deficient because of poor quality.

General Comment

The ASOP seems to really just be common sense things that I would hope everyone is doing already. Were there specific problems that have been brought to your attention that motivated this ASOP?

Regards,

Jeff

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Milliman