

Comment #19 – 4/3/17 – 3:43 p.m.

Thank you for the opportunity to provide feedback on this proposed ASOP. The following comments and questions are being submitted on my behalf.

Section 1.1 Purpose. The ASB has 3 times exposed an ASOP on “Modeling”. What does this ASOP cover that is not included within that proposed ASOP? The proposed “Modeling” ASOP defines assumptions (which is not done within this proposed ASOP), and discusses reasonability of assumptions, especially related to other assumptions, and the output of the model or analysis.

Please describe, and give examples of assumptions that are not used as part of modeling, or in “simple models” excluded from the exposed ASOP on “Modeling”. It would preferable to define this narrow scope (not modeling or simple models) for the proposed “Setting Assumptions”, instead of having the large majority of this proposal rendered moot due to “Modeling” ASOP (**Section 1.2 Scope** would instruct actuaries to follow “Modeling” if using a model).

Section 1.2 Definitions. An ASOP on “Setting Assumptions” should define Assumptions (which is defined in the “Modeling” ASOP).

Also, this proposal mentions “methodology”, which should also be defined.

Section 3.1.3.b Reasonableness of Assumptions. If the results of the results of the analysis... imply a level of complexity beyond a “simple model”. These comments are covered in the “Modeling” ASOP in sections 3.4.7 and 3.5.1.b.

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