

April 28, 2017

Actuarial Standards Board
1850 M Street, NW, Suite 300
Washington, DC 20036-4601

RE: ASOP on Setting Assumptions Exposure Draft Comments

Dear Actuarial Standards Board,

Thank you for the opportunity to provide comments on the ASOP on Setting Assumptions exposure draft. The following comments are submitted on behalf of Jackson National Life Insurance Company.

Overall, Jackson is supportive of the proposed language of the ASOP on Setting Assumptions. However, Jackson proposes for consideration expanded language in section 3.1.5 Changes in Conditions. The additional proposed language is intended to directly discuss the representativeness of available experience (absent a marked change in conditions) and allow for judgment-based adjustments to address limitations caused by unrepresentative experience data as well as changes in conditions. A complete revised version of section 3.1.5, with additional text in *[brackets]* is provided below.

3.1.5 Changes in Conditions *[and Data Representativeness]*

The actuary should consider any material changes in conditions or experience that were known to the actuary by the information date and that might cause assumptions that reflect prior conditions or experience to no longer be appropriate. Examples of changes in conditions include the following:

- a) Internal circumstances regarding the entity such as changes in claims processing or changes in the mix of business; or
- b) External circumstances affecting the entity such as changes in the economic, legislative, regulatory, demographic, technological, and social environments.

[In addition to material changes in conditions, the actuary should consider the representativeness of historical data available on the information date to inform assumptions that apply prospectively. The actuary should consider whether historical data can be expected to be representative of future experience and use professional judgment to make provisions or adjustments to address known data representativeness concerns when setting prospective assumptions.]

Thank you for considering these suggested revisions. We look forward to seeing the final draft of this ASOP.

Sincerely,



Pamela L. Bottles, FSA, MAAA
Vice President, Actuarial
Jackson National Life Insurance Company