

**Comment #14– 5/31/17 – 11:58 p.m.**

Hi – These comments are submitted by Willis Towers Watson:

- 3.4.2.a - The actuary should determine whether recognizing the continuation of mortality trends beyond the valuation date will increase reserves, and if so, the actuary should incorporate such trends into the assumptions for the cash flow projections. Otherwise, the actuary should not project mortality trends beyond the valuation date. Is it really possible to determine a mortality trend in the couple of months between the valuation date and reporting? This may not be a reasonable example.
- 3.4.2.e Taxes—Section 9 of VM-20 requires the company to determine reserves using models in which federal income taxes are excluded from consideration. The actuary should recognize all other taxes in the projection models. Also excludes foreign income taxes.

Kim Steiner

Director

Willis Towers Watson