

**Comment #9 – 5/31/17 – 12:47 p.m.**

For the exposure draft on PBR, can the draft make it clear that existing Actuarial Guidelines either do or do not apply to any aspect of PBR, particularly the Net Premium Reserve. for example, AG17 deals with non-level death benefits and defines the ELRA. Does the ELRA apply to the NPR calculation?  
Thanks.

**Christopher M. Strom, FSA, MAAA  
Manager, Actuarial Services**

PolySystems, Inc.