

**Comment #12 – 7/15/19 – 6:05 p.m.**

To ASB ASOP 2 Revision Committee

These comments are an addendum to the comments I previously sent for consideration:

Section 3.3.2. The ASOP cites a change in premium taxes for some policies as new information that might support changing policy classes. What other types of “new information that is material to the anticipated experience factors” would support reassigning policies to different policy classes?

Sections 3.4.2 and 3.4.2.2. When determining NGE’s for in-force products (section 3.4.2), to what extent must the insurer base any changes on its actual experience for the in-force products at issue and similar products it relied upon in setting its original assumptions for those experience factors? Should its methodology in setting assumptions in the new determination be consistent with how it set those assumptions at pricing?

I look forward to seeing the final version of this important ASOP. I am available to discuss my comments if convenient for the committee.

Best Regards,  
Larry Stern