

**Comment #16 – 7/16/19 – 3:40 p.m.**

Sorry if this is too late. Here are my comments:

**Page 5 – Establishment or changes to policy classes**

- I would like the wording here to be as consistent with NY 210 as possible. Since our work has to comply with regulation over the ASOP, I want it as clear as possible where these differ so I do not mistakenly go against the law when trying to comply with standards. I would have a very hard time trying to make sure I comply with all of NY210, then comply with the extra parts of this that go above 210 but don't contradict it.
- *“3.3.1 a. developed consistently with the guidance in section 3.2 of ASOP No. 12, Risk Classification”*
  - I find this unclear is because ASOP 12 3.2a gives guidance around selecting risk characteristics, but there is nothing in ASOP2 that actually ties 'risk characteristics' back to 'policy classes'. Is this trying to say that a policy class should vary similarly to the risk characteristics from ASOP 12? Then the wording should be “The determination of policy classes should be consistent with the guidance around how risk characteristics should be determined in section 3.2 ASOP 12’. If that’s not what is meant I’m not sure what its trying to say.
  - Is this just trying to say policy classes should vary by the underwriting classification of the policy? Saying that directly is more clear.
- *c. appropriately reflect differences in anticipated experience factors (for example, smoker versus nonsmoker);*
  - It would be helpful if there were more examples (e.g. issue age, risk class, gender etc.)
  - I prefer the 210 wording which I think is saying the same thing “(iii) shall assign policies with material differences in expected costs into different classes;”

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