

Title of Exposure Draft: ASOP 41 June 2022**Comment Deadline: November 1, 2022**

Instructions: Please review the exposure draft, and give the ASB the benefit or your recommendations by completing this comment template. Please

fill out the tables within the section below, adding rows as necessary. Sample for completing the template provided at the following link: <http://www.actuarialstandardsboard.org/email/2020/ASB-Comment-Template-Sample.docx>

Each completed comment template received by the comment deadline will receive consideration by the drafting committee and the ASB. The ASB accepts comments by email. Please send to comments@actuary.org and include the phrase 'ASB COMMENTS' in the subject line. Please note: Any email not containing this exact phrase in the subject line will be deleted by our system's spam filter.

The ASB posts all signed comments received to its website to encourage transparency and dialogue. Comments received after the deadline may not be considered. Anonymous comments will not be considered by the ASB nor posted to the website. Comments will be posted in the order that they are received. The ASB disclaims any responsibility for the content of the comments, which are solely the responsibility of those who submit them.

I. Identification:

Name of Commentator / Company
Bruce Friedland – Friedland Consulting Services, LLC

II. ASB Questions (If Any). Responses to any transmittal memorandum questions should be entered below.

Question No.	Commentator Response
1.	The distinctions between actuarial communications, actuarial reports and actuarial documentation are clear.
2.	I suggest the use of reasonable/unreasonable language. The implication of reasonable/unreasonable to me is that the actuary must be ok at some level with the assumption that is being used. "I wrote this report, Actuary B selected the assumption or method, I do not think it makes sense, but I used it anyway." "Does not significantly conflict" implies to me that "I do not really agree with the assumption or method, but I am still using it."

III. Specific Recommendations:

Section # (e.g. 3.2.a)	Commentator Recommendation (Please provide recommended wording for any suggested changes)	Commentator Rationale (Support for the recommendation)
3.3.3.5.b.ii	Delete the clause.	It is hard for me to see a situation where someone would write a report using 3.3.3.b.5.ii, so the actuary would have to be ok with the assumption choice. I could see this type of language as it relates to 3.3.3.a except that this document does not require such disclosure. I presume it does not prohibit such language either. So, someone could indicate that they have applied prescribed assumptions, yet do not believe that those assumptions are appropriate.

IV. General Recommendations (If Any):

Commentator Recommendation (Identify relevant sections when possible)	Commentator Rationale (Support for the recommendation)

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V. Signature:

Commentator Signature	Date
<p>DocuSigned by: <i>Bruce Friedland</i> 52B4348ACA73465...</p>	<p>8/21/2022</p>