

Title of Exposure Draft: ASOP #41

Comment Deadline: November 1, 2022

Instructions: Please review the exposure draft, and give the ASB the benefit of 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:

John Yonkunas/JPY Services, LLC

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

Question No.	Commentator Response

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)
3.3.6	<p>a. actuarial work that is part of a larger project within a single organization related to the actuary's employment status;</p> <p>e. this section does not apply to actuarial work related to third party organizations</p>	This section seems to be in conflict with 2.4 and 3.3.1. Also, many actuarial reports supporting a captive insurance company application either use or refer to other reports for assumptions, but these reports are not included in the application making the report not in compliance with 2.4 or 3.3.1. Section 3.3.6 seems to allow this to happen via paragraph "a." I suggest some additional or alternative wording.


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
	August 23, 2022