

**Comment #11 – 9/14/22 – 6:01 p.m.**

Hi,

I'm supportive of the overall changes in ASOP 41. I think the new ASOP much easier to understand and apply.

My one criticism is section 3.4: Communication of Material Differences. My understanding of the proposed language would require an actuary to actively track down every prior recipient of any actuarial communication, which seems overly broad. Consider a case where no errors were made but, for example, a conclusion that was actuarially sound at the time changed as the result of unexpected claims run-out. Is the actuary required to find every prior recipient of even an oral conversation and explain that data and conclusions have changed? Does this extend to scenarios where the prior recipient is no longer a client?

The section on Communication of Material Differences in the current version of ASOP 41 requires an actuary to explain the change in the later communication, but doesn't directly address requirements related to the prior communication. If requirements are added related to follow up on the prior communication, I'd appreciate either explicitly narrowing the scope and/or providing more latitude for professional judgement as to the need to follow up with every prior recipient.

Thanks,

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