

Title of Exposure Draft: Proposed Revision of Actuarial Standard of Practice No. 36

Comment Deadline: September 30, 2020

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:

Name of Commentator / Company
Ralph Blanchard

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)
3.6	Add "When not otherwise available" or similar language to the start of the second sentence in this paragraph.	The wording in the second sentence seems to presume that the opining actuary is not an employee, or at least is not involved in the principal's current evaluation of reinsurance collectability. For some companies the evaluation of reinsurance collectability (the Uncollectible Reinsurance Reserve, or URR) is done by actuaries that have access to the information referred to in the second sentence of section 3.6, with that information available to or already in the hands of the opining actuary. It makes no sense to require an opining actuary to "solicit information from management regarding collectability problems, significant disputes with counterparties, and practices regarding provisions for uncollectible recoverables" when they already have this information.

IV. General Recommendations (If Any):

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

V. Signature:

Commentator Signature	Date
Ralph S. Blanchard, III	9/22/2022