

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

Name of Commentator / Company
Tim Aman, FCAS, MAAA; Debbie Ashford, FSA, MAAA; Jay Gotelaere, FCAS, MAAA, CERA, ASA; ERIC A. Keener, FSA, EA / Aon

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)
3.2	Section 3.2 states that "When issuing an oral communication, the actuary may comply with the requirements of section 3.1 subsequent to issuing the oral communication." We ask that the ASB clarify this to mean that an electronic or written follow-up to an oral communication is required only when the actuary presents new actuarial findings that are relied upon by the intended user and the requirements of section 3.1 have not yet been fulfilled.	We request this clarification to avoid sending duplicative documentation to an intended user after every oral communication.
4.1.c	Section 4.1.c requires disclosure of reliance on other sources (see section 3.6) in any actuarial communication. We ask that the ASB clarify that the disclosure of reliance on other sources is only necessary when it has not been previously disclosed as part of the set of actuarial communications in reference to a given actuarial report. So, disclosure of reliance on other sources would only need to be made once and in subsequent communication incorporated by reference to a given actuarial report.	We request this clarification to avoid sending duplicative documentation with every actuarial communication, where reliance on other sources has been previously disclosed.

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IV. General Recommendations (If Any):

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

V. Signature:

Commentator Signature	Date
 Tim Aman, FCAS, MAAA, Executive Managing Director Reinsurance Solutions, Aon	10/28/22
 Debbie Ashford, FSA, MAAA, North America Chief Actuary, Health Solutions, Aon	
 Jay Gotelaere, FCAS, MAAA, CERA, ASA, Executive Vice President – Global Risk Consulting, Aon	
 ERIC A. Keener, FSA, EA, Senior Partner and Chief Actuary, U.S. Retirement, Aon	