

**Title of Exposure Draft: ASOP 41 Actuarial Communications**

**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](mailto: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
Zurich North America

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

Question No.	Commentator Response
1	The distinctions are not clear. Certain categories appear to be subsets of other categories (e.g., an "actuarial report" is a subset of an "actuarial communication").

**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)
3.1.3	The actuary should issue each actuarial communication within a reasonable time period <i>relative to the time at which the request for the actuarial communication was received.</i>	The sentence as written raises the question "Reasonable relative to what"?  Example: If a request for an actuarial communication is forwarded from one actuary ("first actuary") to another ("second actuary") for handling, that second actuary may complete the communication in a reasonable time relative to receiving it from the first actuary. This may not necessarily result in the principal receiving the communication in a timely manner.
3.1.4	Last sentence:  <del>Unless the actuary deems it inappropriate,</del> <i>When appropriate,</i> the actuary issuing an actuarial communication should also indicate the extent to which...	Last sentence:  As currently written, it sounds as though providing information about actuary availability is the norm rather than the exception.
3.3.3.b	Not available	This section appears to reflect the viewpoint of an actuary working in a consulting firm as opposed to an actuary working in an insurance company. It may

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		be worthwhile to provide different content for the latter, where the principal is the employer and those supplying actuarial assumptions are work colleagues.
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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
Mary Beth O'Keefe, FCAS	10/27/2022