

Title of Exposure Draft:

Comment Deadline: [Month, Day, Year]

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
Linda Lankowski

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)
3.13	Delete	Timely communication is simply common sense, not guidance to the actuary. If we somehow need to set deadlines, then guidance might be appropriate, but would require some sort of guidance on what 'timely' means.
3.2	I would prefer a statement to the effect that oral communications may be less structured than written, but that the actuary do his or her best to comply with Section 3.1 requirements when making oral actuarial statements.	While I understand that oral communication is less formal than written, I would find it hard to comply with the requirements of 3.1 after the fact. Does 3.2 mean that my oral communications do not need to be timely? Could my oral communications be unclear as long as I subsequently provided clarification?
3.3.3.a.1	Add the words "reference to" before "the applicable law..."	I don't want to quote the entire law, and reference to the specific law (generally including subsections) should be sufficient.
3.3.4	Remove the second sentence.	The first sentence says the actuary must disclose the date, the second says the actuary doesn't have to. It's not hard to disclose, so eliminate the inconsistency.
3.3.6.d	Find a better word for "brainstorming" (And I'm sorry I couldn't come up with one!)	Actuaries are involved in many discussions about possible alternatives – modeling choices, assumptions, corporate strategy, etc. that I would

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		not consider brainstorming, but I would not suggest being included in an actuarial report.
3.6	Need to require an actuary to review anything provided by “other sources” for reasonableness.	While an actuary may rely on another source for data or assumptions (e.g. administration system output or asset CFs dependent upon investment scenario), the actuary should be required to verify reasonableness. I don’t want the actuary to be able to say it isn’t his responsibility to determine that there is a problem when half the policies disappear, or all assets are sold and the portfolio is held in cash after 15 years.
4.2	Add another disclosure “For assumptions set by others (including those set by law), a statement regarding whether the actuary finds the assumption to be reasonable, and if not, what a reasonable range might be.”	Although I don’t think the actuary should determine the impact of an unreasonable assumption (this could be a considerable burden), I do believe we have an obligation to the public to point out that the assumption is or is not reasonable.
4.2 final paragraph	Change “may be limited” to “may not be required”. Delete “Note that other” in the final sentence.	Section 3.3.6 says the actuarial communication does not have to be a formal report, but doesn’t exactly limit what is included if a formal written communication is provided. I find the entire sentence to be a bit redundant, as the actuary should follow any and all relevant ASOPs. However, if we want to keep the sentence, I would remove the opening phrase.

IV. General Recommendations (If Any):

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

V. Signature:

Commentator Signature	Date
Linda M. Lankowski (signed electronically)	11/01/2022