

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
Mary Beth O'Keefe, FCAS/ Zurich North America, comments based on a group review of the ASOP

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)
2.3	Future cost estimates for expenses related to prospective property/casualty risk transfer or risk retention other than the following: losses, the provision for profit and contingencies, the cost of capital, investment expenses, federal and foreign income taxes, and loss adjustment expenses that are combined with losses in the determination of the provision for losses.	The reference to loss adjustment expenses, as seen in section 3.3.c, appears to be missing here.
2.11	Any mandated assessments that are permitted by applicable law to be included in the expense provisions. Examples of statutory assessments include the various workers' compensation loss-based assessments.	The term "statutory assessment" was not believed to be commonly used. It would be helpful to add examples as is done for other definitions.
3.3	When developing or reviewing expense provisions, the actuary also should refer to ASOP No. 53, <i>Estimating Future Costs for Prospective Property/Casualty Risk Retention and Risk Transfer</i> , and ASOP No. 56, <i>Modeling</i> .	The title of the ASOP appears to be inadvertently omitted.

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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	3/14/2023