### Title of Exposure Draft:

Comment Deadline: [Month, Day, Year]

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: <a href="http://www.actuarialstandardsboard.org/email/2020/ASB-Comment-Template-Sample.docx">http://www.actuarialstandardsboard.org/email/2020/ASB-Comment-Template-Sample.docx</a>

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 <a href="mailto:comments@actuary.org">comments@actuary.org</a> 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	
Craig Chupp, Virginia BOI	

# 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	Change wording in 2 <sup>nd</sup> sentence to: "appointed actuary must annually issue an opinion supported by an actuarial report"	The current wording states that appointed actuary must issue opinion and supporting actuarial report. Per Section 5.B.3(g)(iii) of Model 830, the "opinion shall be supported by an actuarial report". The actuarial report does not have to be completed by the appointed actuary.

## IV. General Recommendations (If Any):

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

#### V. Signature:

Commentator Signature	Cry	Clyp	Date	6	17	/2023
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Title of Exposure Draft: Proposed Revision of ASOPNo. 40

Comment Deadline: [Month, Day, Year]

September 15, 2023