

**Title of Exposure Draft: ASOP 24 – Compliance with the NAIC Life Insurance Illustrations Model Regulation (Second Exposure Draft)**

**Comment Deadline: September 15, 2023**

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](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
Alan Igielski, FSA, MAAA Vice President, Pricing and Product Development, Columbian Financial Group

**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)
3.2.1 c	I recommend that actual experience from reinsurance partners or consultants retained by a company be explicitly identified as part of the universe of "other companies"	I have worked with reinsurers and consultants to develop experience factors for new lines of business or to gauge the impact of changes in product design or underwriting on experience factors. I find this often to be more helpful than more general industry experience studies. But under the ASOP as written these sources of experience data might be considered relegated to "other relevant sources".
3.2.9	The label of "Investment Returns" is incorrect	A more correct description would be "Updating Experience Factors"


**IV. General Recommendations (If Any):**

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

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**V. Signature:**

Commentator Signature	Date
	July 18, 2023