

Title of Exposure Draft: ASOP No. 36 Second Exposure Draft – June 2023

Comment Deadline: November, 1, 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 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
Nicholas Baron / Zurich American Insurance Company, 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)
1.1	Question: Is this referring just to the signing actuary or all actuaries who perform work that contributes to the statement of actuarial opinion?	Unclear as to who this ASOP is now covering.
1.2	Question: Any concerns that this specifically refers to <u>cross-practice</u> ASOPs in the second to last paragraph?	Should that be removed so ASOP 36 governs over all other ASOPs?
3.4.2	Question: Why was the guidance requiring the actuary to review work produced under the actuary's discretion removed?	Precept 3 of the Code of Professional Conduct states that the work shall satisfy applicable ASOPs but does not specifically mention reviewing the work.
3.11	Recommend rewording the third paragraph.	Wording feels clunky and took multiple reads to fully understand what was meant.

IV. General Recommendations (If Any):

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

Title of Exposure Draft: ASOP No. 36 Second Exposure Draft – June 2023

Comment Deadline: November, 1, 2023

V. Signature:

Commentator Signature	Date
Nicholas Baron	10/31/2023