

Title of Exposure Draft: Analysis of Life, Health, or Property/Casualty Insurance Cash Flow Risk

Comment Deadline: June 1, 2024

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: <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
Mark Priven / Prime Actuarial Consulting (dba Bickmore Actuarial)

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	Add: e. Off-balance sheet assets (for example, letters of credit and surety bonds)	The liability consideration section (3.2.2) includes off-balance sheet liabilities. But I think that self-insurers would consider letters of credit and surety bonds used to collateralize their self-insured liabilities to be either off-balance sheet assets or contingent assets. I don't think collateral is considered to be a liability, but I'm not sure about that.

IV. General Recommendations (If Any):

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

V. Signature:

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Commentator Signature	Date
<i>Mark Pium</i>	12/28/23