

**Title of Exposure Draft: ASOP 12 Proposed Revision**

**Comment Deadline: May 1, 2024**

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
Vincent Granieri/ Predictive Resources

**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)
3.2.3	Whether it is appropriate to use a risk characteristic may depend on societal, regulatory, and industry practices or may depend on the scope and context of the actuary's work. (strike highlighted text)	The breadth and inconsistency of regulatory, industry and especially societal practices makes this very difficult to adhere to. Even defining societal, regulatory and industry practices is daunting.
3.2.3		The first two paragraphs of this section allow the actuary to default to actuarial judgment too easily. There should be some sort of hurdle or documentation required before this is allowed
3.2.8	Such external influences include applicable law and business, government, and industry practices. (Strike highlighted text)	The inclusion of 'government practices' is redundant with applicable law and adds confusion. Which government is being referenced here? Applicable law is more appropriate.

3.6 a. when the other party is an actuary, whether the actuary knows that the other actuary is appropriately qualified and has followed applicable ASOPs; (replace party with actuary)

It appears that 3.6 a. applies only when the reliance is on another actuary and the rest apply to all reliances

**Title of Exposure Draft: ASOP 12 Proposed Revision**

**Comment Deadline: May 1, 2024**

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

Commentator Recommendation (Identify relevant sections when possible)	Commentator Rationale (Support for the recommendation)
3.5 – Protected Class should be defined	This is a term that means many things to many people and should be defined in the context of the ASOP.
Many places – for example, 3.4	'material' unintended bias – there will likely be some unintended bias in any risk classification system.

**V. Signature:**

Commentator Signature	Date
Signed electronically – Vincent Granieri	4/29/2024