

**Title of Exposure Draft:** Proposed Revision of Actuarial Standard of Practice No. 41 Actuarial Communications

**Comment Deadline:** 1 June, 2026

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:

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.

Restating comments verbatim or with slight variations may slow down the ASB review process. If you wish to reinforce any comments provided in another commentator's submission, please clearly state how your comments agree or differ.

**I. Identification:**

Hannover Life Reassurance Company of America
Chris Arvia, Matthew Bennett, Stephen Brazil, Brent Carpenetti, Brittany Dooley, Chris Figaro, Laurene Iannucci, Dipa Kapadia, Frank Li, Arpit Mehta, Nik Ondracek, Kelly Rabin, Matt Stedt, Fallon Tingler

**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)
2.7	Clarify that a principal doesn't need to be paying for services (e.g. pro-bono work)	Actuaries provide many types of actuarial services
2.8	Clarify whether an SAO is specifically referring to "actuarial judgement" vs things that are fact	Concerned that raw analysis could be interpreted as a finding and therefore an SAO
2.8	The use of the term "actuarial services" which refers to principal in 2.3 but the rest of 2.8 refers to intended user	Clarity between 2.3 and 2.8

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

**Title of Exposure Draft:** Proposed Revision of Actuarial Standard of Practice No. 41 Actuarial Communications

**Comment Deadline:** 1 June, 2026

Commentator Recommendation (Identify relevant sections when possible)	Commentator Rationale (Support for the recommendation)
Is there a safe harbor for actuaries to disclose that something is specifically not an SAO?	Allow actuaries to specify that something should not be relied on as a statement of actuarial opinion
Section 2.8 Clarity – if you are responding to industry groups/regulators, when does that become a statement of actuarial opinion?  At what point does a work product become a statement of actuarial opinion? For example, do discussions during assumption development for pricing constitute a series of SAOs?	It would be helpful to have specific examples of what is and isn't considered an SAO.

**V. Signature:**

Commentator Signature	Date
Chris Arvia, Matthew Bennett, Stephen Brazil, Brent Carpenetti, Brittany Dooley, Chris Figaro, Laurene Iannucci, Dipa Kapadia, Frank Li, Arpit Mehta, Nik Ondracek, Kelly Rabin, Matt Stedt, Fallon Tingler	5/29/2026