

May 15, 2026

Via Email (comments@actuary.org)

Actuarial Standards Board
1850 M Street, NW, Suite 300
Washington, DC 20036

Re: ASOP No. 6 Exposure Draft Comments

To the Actuarial Standard Board:

This letter provides my comments to the proposed revision to Actuarial Standard of Practice (“ASOP”) No. 6 “Measuring Retiree Group Benefits Obligations and Determining Retiree Group Benefits Program Periodic Costs or Actuarially Determined Contributions Obligations”.

My comments are limited to the exceptions for using age adjusted per capita costs as indicated in Section 3.7.7b. More specifically, 3.7.7b(2) states that initial and projected per capita costs may be developed without regard to adjustments for age only if:

“costs do not vary significantly by age for the type of benefit plan being valued (for example, Medicare Advantage plans, or medical plans with a sufficiently low annual benefit limit).”

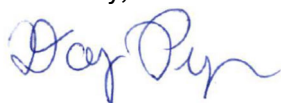
My concern pertains to the wording “medical plans have a sufficiently low annual benefit limit”. I do not believe it is the intent, but this could be interpreted to mean that a plan with age related premium costs with a low employer paid portion of the premium can exclude age adjustments. I would recommend this example is removed or clarified.

Note that if an employer requires that retirees secure their own health insurance outside of the employers plan and the employer pays a low amount (e.g. \$50/month), I believe there is no implicit subsidy, and hence no age adjustments should be made. This is because there is no employer payment of active premiums that can be used for retiree costs. Perhaps this is the situation that might be used as an example.

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Thank you for the opportunity to submit my comments. Should you have any questions or want to discuss, please contact me (510-384-5241).

Sincerely,



Doug Pryor, ASA, EA, MAAA
Consulting Actuary