

Title of Exposure Draft: PROPOSED REVISION OF ASOP NO. 41-ACTUARIAL COMMUNICATIONS (3rd EXPOSURE DRAFT)

Comment Deadline: [Month, Day, Year]

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 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:

Name of Commentator or Company
MICHAEL BAYARD SMITH (personal comment)

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)
Section 4.2(f) – Required Disclosures in an Actuarial Report (Description of models)	Clarify disclosure expectations and compliance safe harbors for non-deterministic, advanced AI models and LLMs where step-by-step mathematical replication is impossible.	Section 4.2(f) requires a model description of "sufficient clarity that another actuary... could make an objective appraisal of the reasonableness of the actuary's work." Advanced machine-learning networks function as non-deterministic networks, making exact path replication mathematically impossible. The standard should clarify whether disclosing the high-level operational framework, prompt architecture, and validation protocols satisfies the intent of Section 4.2(f).
Section 4.2(i) – Required Disclosures in an Actuarial Report (Prescribed Assumption or Method Set by Another Party)	Explicitly clarify whether third-party commercial AI platforms or software developers constitute "another party" under this section.	When an actuary utilizes calculations or methods embedded within proprietary machine-learning software, the underlying mechanics are frequently shielded by vendor intellectual property rights. Actuaries require explicit guidance on whether a commercial AI platform constitutes "another party" so they can properly structure disclosures regarding their review for reasonableness or disclaim responsibility for vendor-generated algorithmic outputs.
Section 3.3 – Responsible Actuary & Section 2.1 – Actuarial Communication	Add forward-looking guidance confirming that the use of generative text tools does not absolve the signing actuary of professional responsibility for technical output.	Generative AI tools are increasingly adopted to draft, summarize, or optimize electronic communications. Because Section 3.6 assumes the signing actuary takes full responsibility for the communication unless otherwise disclosed, the standard should explicitly state that the use of generative text tools does not alter or reduce the signing actuary's ultimate liability for errors or omissions introduced by an AI platform.

IV. General Recommendations (If Any):

Commentator Recommendation (Identify relevant sections when possible)	Commentator Rationale (Support for the recommendation)
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<p>Acknowledge the rapid operational integration of artificial intelligence—specifically Large Language Models (LLMs) and advanced machine-learning tools—by establishing a foundational framework for AI-assisted actuarial work within this standard itself or in other guidance, such as a practice note.</p>	<ul style="list-style-type: none"> As currently written, the Third Exposure Draft remains entirely silent on the deployment of artificial intelligence in the actuarial workflow. Actuaries are actively using generative AI to draft communications and deploying machine-learning algorithms to conduct data analysis. Leaving these technologies unaddressed creates a dangerous regulatory gap. A general statement should be added to the standard affirming that while advanced technologies may optimize workflow, the credentialed actuary retains ultimate professional responsibility for validating the technical accuracy, disclosure completeness, and confidentiality protection of all automated outputs. Addressing this holistically at a principles-based level prevents the standard from becoming obsolete shortly after its final adoption.
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V. Signature:

<p>Commentator Signature</p>	<p>Date</p>
<p>MICHAEL BAYARD SMITH</p>	<p>JUNE 1, 2026</p>