

**Comment #1 – 10/24/11 – 12:38 p.m.**

I am responding to the request for comments on the Exposure draft of ASOP 28.

I was pleasantly surprised by Question 3 on the second page of the cover memo. I have always thought that this ASOP's scope was too broad because I thought it applied any time I used output from a model outside my expertise, even if an expert ran the model. I read the scope in the Exposure Draft and find that I still come to my original conclusion - that it applies anytime I use output from such a model regardless of who runs the model. I suggest adding a sentence to the scope making the distinction between "using the model" and "relying on the output of the model prepared by others."

My only other comment relates to section 3.1.b. I would prefer to see an actuary be able to rely on a review of such a model not only by another actuary but also by an expert.

Thank you for your consideration of my comments.

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