

Comment #6 – 1/11/12 – 1:18 p.m.

Thank you all for your work in developing the revised ASOP 38. I am writing to express my concern regarding the changes from the current version. In a consulting environment, actuaries often do not have any direct access to the models. The model output is provided by the client. Oftentimes, the client is not an actuary. I do not believe that many consulting actuaries will be able to meet the requirements of the revised standard. I request that this position be reconsidered.

Please let me know if you need additional detail on this.

Thanks for your consideration.

Regards,

- Dee Dee

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