

Comment #17 – 12/30/13 – 2:52 p.m.

General: It would be nice to have less detailed required knowledge when the cat model use is de minimis for the task at hand. Example: Damage to autos from hurricanes in Iowa. It makes sense to use model output in order to use similar methodology across lines and/or perils, but this requires an awful lot of information, which seems inefficient given the impact.

Question #3: [**The proposed ASOP does not apply when the actuary is only designing.....**]

I think this is inappropriate There are two problems:

- (a) In order to design, build, a cat model, one needs to have at least the same level of understanding as required by ASOP #38.
- (b) A scenario could occur where the model user complies with ASOP #38 by relying on the modeler's actuary. The modeler's actuary is not required to comply with ASOP #38 and therefore may not have an in-depth understanding of the cat model or have looked at it very closely.

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