

**Comment #5 – 12/6/13 – 7:37 p.m.**

Comments on Proposed Revision of Actuarial Standard of Practice No. 38

I question the need for two standards of practice on modeling. The guidance in this draft would be good practice with respect to other types of models too, not just models of catastrophic events. I fail to see why these additional requirements should be imposed on models of certain types of events.

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