

**Comment #26 – 2/28/15 – 5:09 p.m.**

The following are comments on the Second Exposure Draft on Modeling.

I would first like to thank the Modeling Task Force for their extensive work on this draft.

1. Section 3.1.1            I think this section focuses too much on materiality and reliance on the model, and would prefer if the standard left application more to the actuary's professional judgment.
2. Section 3.1.3            This section seems to place less strict standards on Actuaries on the Modeling team than were placed on users of models developed by others in 3.1.2. I also think that it should be clarified how the ASOP would apply when the actuary is on a modeling team made up of non-actuaries, who would not themselves be subject to the ASOPs.
3. Section 3.3.1(a)(2)    I think that making the distinction between the three terms is confusing and may not be necessary. In this context, I would prefer just "intended purpose".
4. I would like to echo the comments made by Greg Frankowiak on the breadth of the draft.

Thank you again for the opportunity to comment on the Draft ASOP.

Jeff Stoiber, ACAS