

Comment #10 – 6/19/17 – 1:36 p.m.

Pinnacle Actuarial Resources, Inc. (Pinnacle) is pleased to have the opportunity to provide the following comments in regards to the Exposure Draft of ASOP No. 17, *Expert Testimony by Actuaries*.

Response to the specific questions posted

1. Does the proposed revision appropriately reflect guidance for all areas of actuarial practice?

The document seems to provide guidance for all areas. There is nothing “too specific” that should prohibit another practice area. The challenge with this is that there will always be new and previously unheard cases that stretch the guidelines. It may be appropriate to include a reference to the available Actuarial Board for Counseling and Discipline (ABCD) guidance as needed.

2. Are there changes in current practice since the existing ASOP was adopted that are not reflected in this proposed revision?

Changes in current practice are appropriately reflected in the revision.

3. Is the scope clear and appropriate, including the specific addition of rate hearings?

The scope is clear and appropriate.

4. Is this ASOP’s proposed effective date of four months following the ASB’s adoption sufficient?

Four months is sufficient. However, there needs to be clarification about which version of the ASOP applies if the testimony starts prior to the adoption date but is ongoing after the effective date.

The comments above are the collected comments of the consultants employed by or affiliated with Pinnacle. If you have any questions regarding our comments, please contact Laura Maxwell at lmaxwell@pinnacleactuarial.com.