

**Comment #1 – 5/5/17 – 12:24 p.m.**

I have read the exposure draft and do not suggest any changes. Also, I have answered the questions for which comments have been requested. My comments are in red below

Thank you for distributing the exposure draft to the actuarial community.

Kelly McKeethan, FCAS, MAAA, CERA

1. Is the guidance concerning VM-G clear and appropriate (section 3.1)?

Yes.

2. Is the guidance concerning the PBR Actuarial Report clear and appropriate (section 4.2)?

Yes.

3. Are there any significant inconsistencies between the requirements of this draft ASOP and the requirements of the Valuation Manual?

I am not aware of any.

4. Does the proposed effective date of December 31, 2017 provide sufficient time to comply with this standard if the ASB adopts the standard in September 2017?

Yes.

Kelly McKeethan