

**Title of Exposure Draft: ASOP 2**

**Comment Deadline: November 13, 2020**

Instructions: Please review the exposure draft, and give the ASB the benefit of your recommendations by completing this comment template. Please fill out the tables within the section below, adding rows as necessary. Sample for completing the template provided at the following link: <http://www.actuarialstandardsboard.org/email/2020/ASB-Comment-Template-Sample.docx>

Each completed comment template received by the comment deadline will receive consideration by the drafting committee and the ASB. The ASB accepts comments by email. Please send to [comments@actuary.org](mailto:comments@actuary.org) and include the phrase 'ASB COMMENTS' in the subject line. Please note: Any email not containing this exact phrase in the subject line will be deleted by our system's spam filter.

The ASB posts all signed comments received to its website to encourage transparency and dialogue. Comments received after the deadline may not be considered. Anonymous comments will not be considered by the ASB nor posted to the website. Comments will be posted in the order that they are received. The ASB disclaims any responsibility for the content of the comments, which are solely the responsibility of those who submit them.

**I. Identification:**

Kelly Rabin
My opinions are my own, not those of my employer.

**II. ASB Questions (If Any). Responses to any transmittal memorandum questions should be entered below.**

Question No.	Commentator Response

**III. Specific Recommendations:**

Section # (e.g. 3.2.a)	Commentator Recommendation (Please provide recommended wording for any suggested changes)	Commentator Rationale (Support for the recommendation)
3.4.2.4.a	Strike this item	The wording in the proposed ASOP says: "should a. identify, under the terms of the policy and applicable law, the anticipated experience factors that may be used when revising NGE scales;"  The reference to "under the terms of the policy and applicable law" makes this a legal question, not an actuarial one. The actuary should document what anticipated experience factors are being used, but that direction should come from the insurer.

**IV. General Recommendations (If Any):**

Commentator Recommendation (Identify relevant sections when possible)	Commentator Rationale (Support for the recommendation)

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I endorse Stephen Blaske's letter.	Blaske does an excellent job explaining why certain sections in the proposed ASOP go too far in terms of level of prescription. The examples he cites are good ones.

**V. Signature:**

Commentator Signature	Date
Kelly J. Rabin, FSA, CFA, MAAA	11/05/2020