

**Title of Exposure Draft:**

**Comment Deadline: [Month, Day, Year]**

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:**

Name of Commentator / Company
David Minches / self-employed

**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)
2.3	I would expand the definition of "Actuarial Report" to include reports which have "findings and recommendations". Non-audit work performed by actuaries who work for audit firms is often limited to findings and recommendations as opposed to conclusions. However, these reports are no different in terms of actuarial communications than those which contain conclusions.	I worked for EY for 35 years and peer-reviewed many of the non-audit reports. While these reports did not contain conclusions, there were still bound by the provisions of ASOP 41 the same way audit and other conclusion-based reports were. I would not limit the definition of Actuarial reports to those with conclusions.

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

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

**V. Signature:**

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Commentator Signature	Date
David Minches	November 27, 2024