

## Title of Exposure Draft: ASOP 41 Actuarial Communication

**Comment Deadline: March 15, 2025**

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
Steven Armstrong on behalf of Allstate Insurance Company actuaries

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

Question No.	Commentator Response
1.	<p>In general, the latest exposure draft removed language that specified when an actuarial report should be issued and may suggest that any actuarial communication containing conclusions, including oral or electronic exchanges, requires a report. One can also imply that all actuarial communication should have an intended user and then further require that an actuarial report be issued.</p> <p>It would help to further clarify when actuarial reports are necessary by providing examples of when an actuarial report should be made compared to when an actuarial communication is sufficient.</p>
2.	<p>The latest exposure draft has an opportunity to be clearer on when guidance applies for all actuarial communications and only to actuarial reports. The reader can deduce by the language of each section, but it could be helpful in reworking the section titles to make it more explicit that Section 3 applies to all actuarial communications and Section 4 to actuarial reports, specifically. In addition, it would be helpful to provide examples to differentiate the two sections.</p>

### 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)
2.1	<p>"A written, electronic, or oral communication issued by an actuary with respect to actuarial services. An electronic communication is a written or oral communication issued by means of a computer or other electronic device."</p>	<p>With the need to define electronic communication within the Actuarial communication definition, we would suggest having it broken out separately.</p>
2.2	<p>We would recommend adding some examples of what is not considered actuarial conclusions.</p>	<p>The current definition is broad and providing some examples of what is not in scope can add more clarity.</p>
2.3	<p>"An actuarial communication that the actuary issues <i>for intended users</i> in writing or another permanent form to support actuarial conclusions."</p>	<p>Adding verbiage that actuarial reports require intended users leaves less ambiguity towards when a report should be issued.</p>

**Title of Exposure Draft: ASOP 41 Actuarial Communication**

**Comment Deadline: March 15, 2025**

3.1	When an actuarial communication is not properly <u>documented</u> , the actuary should consider following up with <u>documented</u> communication.	A slight word change since the current use of "recorded" can be unclear or have different interpretations.
4.1.n	"when relying on another party and <u>choosing</u> to disclaim responsibility for material assumptions and methods set by another party,..."	This wording change would clarify that the actuary can choose to adopt assumptions rather than automatically needing to disclaim them.

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

Commentator Recommendation (Identify relevant sections when possible)	Commentator Rationale (Support for the recommendation)
Section 2 Structure – We would suggest ordering the definitions, so the related terms are grouped together - 2.4, 2.5, 2.8, 2.1, 2.2, 2.3, 2.6, 2.7, 2.9.	This groups the services, intended users and principal together first, then the types of communication, then information date, methodology, and subsequent events.

**V. Signature:**

Commentator Signature	Date
Steven Armstrong, FCAS, MAAA	3/12/2025