

AAA Valuation Law and Manual Team

This call was a continuation of the August 29th call. The express purpose was to cover all remaining comments that had not been discussed because of time constraints.

- 1) One interested party recommended some changes that would clarify language and remove ambiguities.
- 2) The National Alliance of Life Companies recommended some steps to help small companies, such as a phase-in by product complexity, an exemption for companies under \$100 million of assets and simplified treatment of products without material tail risk.
- 3) The Academy's Life Reserve Work Group had submitted a response to New York's comments on its proposal. LHATF deferred discussion because no representative from NY was on the call and because LRWG plans to meet with NY directly next Monday.
- 4) LHATF revisited the reliance of the opining actuary on other actuaries. Some members noted that P&C actuaries and Canadian actuaries are permitted to do so. Others noted that the AOMR does not seem to allow it. LHATF seems generally open to permit it in some form.
- 5) LHATF discussed the logistics of allowing each Commissioner the authority to disapprove the appointment of a reviewing actuary.

The discussion will continue at the September 28-29 meeting.

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