



AMERICAN ACADEMY *of* ACTUARIES

---

December 26, 2003

Director, TA&I — FSP  
Financial Accounting Standards Board  
401 Merritt 7  
PO Box 5116  
Norwalk, CT 06856-5116

Re: FSP FAS 106-a

Dear Sir or Madam:

On behalf of the American Academy of Actuaries'<sup>1</sup> Joint Committee on Retiree Health, we would like to take this opportunity to indicate our support for the proposed FASB Staff Position (FSP) on Financial Accounting Statement 106 (FAS 106)— deferring any accounting for the effects of the Medicare Prescription Drug, Improvement and Modernization Act of 2003. Members of this committee have already been asked by plan sponsors to provide actuarial insight into both the new law and its impact on compliance with FAS 106. We anticipate providing insight as a nonpartisan resource in the implementation of aspects of the law mentioned in the FSP and would welcome the opportunity to work closely with FASB on this important issue, as well.

Please feel free to contact Heather Jerbi, the Academy's pension policy analyst (202-785-7869; [jerbi@actuary.org](mailto:jerbi@actuary.org)) with any questions or if we can be of any assistance.

Sincerely,

Jeffrey P. Petertil, ASA, MAAA  
Co-Chairperson  
Joint Committee on Retiree Health  
American Academy of Actuaries

Adam J. Reese, FSA, MAAA  
Co-Chairperson  
Joint Committee on Retiree Health  
American Academy of Actuaries

---

<sup>1</sup> The American Academy of Actuaries is the public policy organization for actuaries of all specialties within the United States. In addition to setting qualification standards and standards of actuarial practice, a major purpose of the Academy is to act as the public information organization for the profession. The Academy is nonpartisan and assists the public policy process through the presentation of clear actuarial analysis. The Academy regularly prepares testimony for Congress, provides information to federal and state elected officials, regulators and congressional staff, comments on proposed federal and state regulations and legislation, and works closely with state officials on issues related to insurance. The Academy also develops and upholds actuarial standards of conduct, qualifications and practice, and the Code of Professional Conduct for all actuaries practicing in the United States.