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General Comments: In general I do not believe there is a pressing need to open the standards at this time. there are various activities taking place in the US today that may lead to the need to revise standards in the future.

Thus a more efficient approach might be to wait a few years before initiating this process.

Question 1: I am not aware of such situations. The Casualty Practice Council has a process that other Councils might want to emulate if there are a limited # of such situations in existence. If the QS are opened, I believe that they should be strengthened to ensure that anyone changing practice areas should be required to have 3 years of relevant experience under the direction of a qualified actuary before they can provide statements of opinion that are prescribed by statute or regulation.

Question 2: I do not have any examples of such areas.

Question 3: There are always instances where individual actuaries may not be clear on the characterization of specific activities, however in general the categories are pretty clear.

Question 4: I do not see a need for a cap as long as all are clear that one must have sufficient hours related directly to their area of practice.

Question 6: Not at this time.

Question 7: It seems to me that all actuaries issuing statements of actuarial opinion in the US should have some relevant continuing education every year.