

Comment 8—9/3/2020—2:57 p.m.

I am commenting on the Sept 2 exposure draft of revisions to the Qualification Standards for Actuaries issuing Statements of Actuarial Opinions in the US

Section 2.1 discusses basic education and experience requirements.

Subsections d 1 and 2 display requirements to issue Statements in any particular area of practice. They require Fellowship in the CAS or SOA as well as Academy membership.

I do not see the need for academy membership as a valid requirement.

I have accumulated my knowledge of the casualty field by virtue of becoming an FCAS and my experience in the field. I don't believe being a member of the AAA has added much to that knowledge so that it needs to be a requirement as well.

In looking at the previous Qualification standards I don't see the AAA requirement present in order to issue opinions.

Since most of what we do is considered issuing of opinions this requirement will mandate all actuaries join the AAA.

I do not believe this is needed or appropriate

Sincerely,

Steven Visner, FCAS, MAAA