

14567 Florissant Path Apt 203

Apple Valley, MN 55124

November 18, 2024

Mr. Scott O'Neal FSA, MAAA

NAIC

Dear Scott,

I am writing to you in connection with the recent re-exposure of the Knowledge Statements for Appointed Actuary for Life Blank.

I ask that the following items be considered:

(a) The Knowledge Statement appears to apply to the Appointed Actuary (singular).

I suggest that it should apply equally to

- (i) Every Qualified Actuary, as defined in the Valuation Manual; and
- (ii) Regulators who review VM-30 reports.

If one or both of these is agreed to in principle, then I recommend that the Knowledge Statement reflect them.

(b) Line 32 of the Summary of Operations, labelled "Federal and foreign income taxes incurred..." requires knowledge of federal tax reserves. I recommend that the Appointed Actuary (and Qualified Actuary) be required to have such knowledge, and that this requirement be reflected in the Knowledge Statement.

Thank you.

A handwritten signature in black ink, appearing to read "John Robinson". The signature is fluid and cursive, with a prominent initial "J" and "R".

John Robinson FSA, FCA, MAAA