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These opinions are mine alone, and do not represent those of my employer or other colleagues.

**Question 1:** I don't know of this happening, and my concern is the opposite. At a time where it is vital for actuaries to present a learned and professional demeanor, our focus should not be on finding new ways to bring actuaries to qualification, but in reinforcing the current standards and maintaining quality and excellence within the profession.

**Question 2:** No new areas are immediately apparent, although these can also be addressed through adjustments to the syllabus rather than additional qualification standards.

**Question 3:** The demarcation between categories appears clear. However, CEO surveys constantly reinforce the fact senior management would like actuaries to become better communicators and understand more fully how business operates. A cap of 3 hours on general business CE seems inconsistent with this aim.

**Question 4:** This appears to be a solution in search of a problem.

**Question 5:** Many actuaries work outside the United States, where achieving organized activity hours may be problematic. I believe expanding the requirement here could prove an undue burden to these actuaries, and as a result would prefer the current standard be maintained.

**Question 6:** No changes

**Question 7:** The provisions are clear enough. Actuaries in some parts of the profession, particularly consulting, often have erratic or uneven schedules based on workload. The current standard provides them flexibility to fit CE in alongside their other work at opportune times. The potential full year carryover should not be an issue for any actuary whose memory spans at least two years.