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General Comments: I think Section 3.1.1.2 (Property Casualty) of the QS properly identifies only the AAA and CAS as organizations that can qualify actuaries to give opinions on property and casualty insurance. Right now the SOA does not have an established and trusted set of property and casualty exams, and I don't think the AAA should pre-emptively grant them permission to qualify property and casualty actuaries.

Question 4: I do think there should be a maximum, as some of each person's CE should be on non-professionalism topics. Considering the minimum is 3, a maximum of 10 seems reasonable.