

PRIVATE AND CONFIDENTIAL

18 August 2010

The Director
Board for Actuarial Standards
5th Floor, Aldwych House
71-91 Aldwych
London
WC2B 4HN

Dear Sir

Response to Exposure Draft on Transformations Technical Actuarial Standard

Barnett Waddingham LLP is a UK based firm of actuaries and consultants. We provide a wide range of actuarial and consultancy services to Insurance Companies, Friendly Societies, Auditors and captive insurers based in the UK and overseas. We therefore consider the consultation paper on the proposed Transformations Technical Actuarial Standard (TAS-T) with great interest.

The following represents the views of many but not necessarily all the actuaries working in the Insurance Practice at Barnett Waddingham LLP regarding insurance transformations.

The draft Transformations TAS requires reports on Insurance Transformations to cover material changes to the nature of cashflows. However, we are concerned that there is no guidance on the reporting of how the transformation affects policyholders' non-financial expectations such as service standards. This would be particularly relevant where a transformation relied on changes to service standards in order to ensure that sufficient financial resources are available to meet policyholders' benefit expectations.

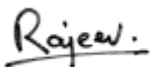
Responses to Specific Questions

1 Proposed commencement date of the Transformations TAS

Given the length of time needed to carry out the work and report on Insurance Transformations, we consider that the final Transformations TAS should be made available a minimum of 6 months before its proposed commencement date.

If you would like to discuss these comments in more detail then please let me know.

Yours faithfully



**Rajeev Shah FIA, Partner
Barnett Waddingham LLP**