

FASB Fair Value Measurement - Deferral

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Respondent information

Type of entity or individual:

ESOP Administration Firm

Contact information:

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Questions and responses

1. Do you agree with the indefinite deferral, as well as the Board's decision to defer for investments held by nonpublic employee benefit plans, only the quantitative information about the significant unobservable inputs used in Level 3 fair value measurement of its plan sponsor's own nonpublic entity equity securities, and not the qualitative information, required by paragraph 820-10-50-2(bbb)? Why or why not?

Yes, I agree with the Board's decision as it will help protect nonpublic entities from having confidential information disclosed through the DOL's website. The fiduciaries of employee benefit plans holding nonpublic entity equity have access to all of the quantitative information.

The qualitative information that must be disclosed will not be as detrimental as the quantitative information. In a perfect world, however, I would prefer the qualitative information would not be publicly disclosed.

2. Do you agree with the limited scope of plan sponsor's own nonpublic entity equity securities covered by the proposed Update? If not, what other investments should be included or excluded from the guidance in the proposed Update and why?

Yes, I agree with the limited scope. The quantitative disclosure of the nonpublic entity's own information is the concern for our clients which are primarily ESOP companies.

3. Do you agree with the scope of the employee benefit plans in this proposed Update? If not, which other employee benefit plans should be included or excluded from the guidance in the proposed Update and why?

I agree with the scope.

4. Do you agree with the definition of nonpublic employee benefit plan? Is it understandable and operable?

I agree the definition is understandable and operable.

Additional comments-updt. Please provide any additional comments on the proposed Update:

I appreciate FASB's response to an issue that could have harmed nonpublic entities with employee ownership through their employee benefit plans.

Additional comments - process. Please provide any comments on the electronic feedback process:
