

# ***FASB Fair Value Measurement - Deferral***

Date of Entry: 5/17/2013

## **Respondent information**

### **Type of entity or individual:**

Privately held ESOP company

### **Contact information:**

*Organization:* Dansko

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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?

I agree with the indefinite deferral. Certain data from privately held companies with ESOPs contain sensitive and confidential information that should not be made publicly available as this could be damaging to those companies and their employee owners. The indefinite deferral protects against release of this information to unintended third parties.

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.

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?

Yes.

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

Yes.

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

I would like to thank FASB for its prompt and appropriate handling of this issue which is of great importance to Dansko's 100+ employee-owners.

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