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May 29, 2013

Ms. Susan M. Cosper
Technical Director
Financial Accounting Standards Board
401 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116

By e-mail: director@fasb.org

Re: Proposed Accounting Standards Update – *Fair Value Measurement (Topic 820): Deferral of the Effective Date of Certain Disclosures for Nonpublic Employee Benefit Plans in Update No. 2011-04*

(File Reference No. 2013-260)

Dear Ms. Cosper:

The New York State Society of Certified Public Accountants (NYSSCPA), representing more than 29,000 CPAs in public practice, industry, government and education, welcomes the opportunity to comment on the above captioned exposure draft.

The NYSSCPA's Financial Accounting Standards Committee deliberated the exposure draft and prepared the attached comments. If you would like additional discussion with us, please contact J. Roger Donohue, Chair of the Financial Accounting Standards Committee at (917) 887-7809, or Ernest J. Markezin, NYSSCPA staff, at (212) 719-8303.

Sincerely,

Gail M. Kinsella
President

Attachment

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NEW YORK STATE SOCIETY OF

CERTIFIED PUBLIC ACCOUNTANTS

COMMENTS ON

PROPOSED ACCOUNTING STANDARDS UPDATE – FAIR VALUE MEASUREMENT (TOPIC 820): DEFERRAL OF THE EFFECTIVE DATE OF CERTAIN DISCLOSURES FOR NONPUBLIC EMPLOYEE BENEFIT PLANS IN UPDATE NO. 2011-04

(FILE REFERENCE NO. 2013-260)

May 29, 2013

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New York State Society of Certified Public Accountants

Comments on

Proposed Accounting Standards Update – *Fair Value Measurement (Topic 820): Deferral of the Effective Date of Certain Disclosures for Nonpublic Employee Benefit Plans in Update No. 2011-04*

General Comments

The NYSSCPA was delighted to have the opportunity to opine on the exposure draft and offers these comments.

We agree with the Proposed Accounting Standard Update Presentation of Financial Statements (Topic 820) Deferral of Effective Date of Certain Disclosures for Nonpublic Employee Benefit Plans in Update 2011-04.

We believe the proposed update is appropriate, but have an additional consideration as noted in our response to Question 2. We believe that the guidance should be expanded to include investments in the stock of nonpublic subsidiaries of the plan sponsor.

Question 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?

Response: Yes, we 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.

Question 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?

Response: We agree with the limited scope of plan sponsor's own nonpublic entity equity securities covered by the proposed Update; however, an exception should be expanded to include investments in the stock of nonpublic subsidiaries of the plan sponsor. In our experience, as a result of mergers, some plans for employees of a subsidiary may hold investments in the stock of the nonpublic subsidiary.

Question 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?

Response: Yes, we agree with the scope of the employee benefit plans in this proposed Update.

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

Response: Yes, we agree with the definition of nonpublic employee benefit plan. Yes, the definition is understandable and operable.