

From: Renaud, Larry [mailto:lrenaud@chatsworth.com]
Sent: Wednesday, May 29, 2013 4:33 PM
To: Director - FASB
Subject: Comments on impact of required disclosures under Accounting Standards Update (ASU) 2011-04 on private companies with ESOP ownership ("private ESOP companies")

May 29, 2013

Technical Director
Financial Accounting Standards Board
401 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116

Re: File Reference No. 2013-260 – Deferral of Effective Date of Certain Disclosures for Nonpublic Employee Benefit Plans in Update No. 2011-04

Chatsworth Products, Inc. ("CPI") is a private, 100% employee-owned S corporation. All of the outstanding shares of CPI are held by the company-sponsored employee stock ownership plan ("ESOP"). We have been 100% employee-owned since 1991. The continued success of the company is directly attributable to the effort put forth by each and every employee-owner. The pride of ownership and mutual respect shared among the employee-owners is best reflected in our choice of company motto: *We're all in This Together*. As we begin our third decade of operation, this basic philosophy has resulted in significant growth and expansion, highlighted by a multifold increase in sales and company value since the inception of our ESOP.

As a privately-held employee-owned company, we wish to respectfully express our support of the proposed amendments that would indefinitely defer required quantitative disclosure requirements for nonpublic employee benefit plans that hold investments in its plan sponsor's nonpublic equity securities that are within the scope of the disclosure requirements contained in FASB Accounting Standards Update No. 2011-04, *Fair Value Measurement (Topic 820): Amendments to Achieve Common Fair Value Measurement and Disclosure Requirements in U.S. GAAP and IFRSs*.

In the past few years, the Department of Labor ("DOL") has made Form 5500s filed by plan sponsors available to the public via its website. This information made available online includes the entire Form 5500 filing, which encompasses the plan's audited financial statements and related disclosures. In the absence of the proposed deferral of the quantitative disclosure requirement, these disclosures would make public information regarding our company that otherwise would and should remain private. This is so because our ESOP's investment in the sponsor's equity securities (CPI common stock) is the only Level 3 measurement in the financial statements of the ESOP, indeed it is the only asset held by the ESOP. As you can imagine, in the hands of competitors, customers, suppliers and potential corporate raiders, this information could be damaging to the company and ultimately to our employee-owners.

On behalf of the employee-owners of Chatsworth Products, Inc., we respectfully request that FASB approve the amendments to the FASB Accounting Standards Codification® as presented in its Exposure Draft, issued April 30, 2013, File Reference No. 2013-260. We sincerely appreciate this opportunity to share our concerns with respect to this topic.

Respectfully submitted,

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