

FASB Fair Value Measurement - Deferral

Date of Entry: 5/30/2013

Respondent information

Type of entity or individual:

Accounting Firm/Auditor

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 to indefinitely defer the quantitative disclosure requirements under paragraph 820-10-50-2(bbb). Disclosing such information that ultimately would be available to anyone would be damaging to existing privately held ESOPs, as well as stunt the creation of new ESOPs. Since bonafide users of this information can request and receive the full valuation report, providing snapshot information would have little value and benefit.

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?

I agree

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

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

I agree with the definition and believe it is understandable and operable.

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

I would like to thank FASB for their quick attention to this matter, which is a critical issue to the ESOP community and it's employees.

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