FASB Fair Value Measurement - Deferral

Date of Entry: 5/31/2013

Respondent information

Type of entity or individual:

CFO of 100% ESOP owned S Corp

Contact information:

Organization: Parksite Inc.

Name: Ronald C. Barthel

Email address: rbarthel@parksite.com

Phone number: 630-761-6758

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 am in agreement with indefinite deferral and with the specific deferral of quantitative information only. My Company is of the belief that the quantitative deferral disclosure requirements would disclose sensitive information that would not otherwise have been publicly accessible and that this disclosure could cause potential damage to the business.

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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, we agree with the limited scope.

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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.

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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:

None.

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

None.