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December 16, 2013

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

Subject: File Reference No. EITF – 13D

Dear Ms. Cospers:

We appreciate the opportunity to provide comments to the Financial Accounting Standards Board ("FASB" or "Board") on its October 23rd Exposure Draft regarding clarification of accounting for share-based payments which contain a performance target that could be satisfied after the requisite service period. Unum Group ("Unum") operates primarily in the United States and the United Kingdom and is the largest provider of disability insurance products in those two countries. Unum also provides a complementary portfolio of other insurance products, including employer- and employee-paid group benefits, life insurance, and other related services.

We support the FASB's intent to remove diversity from practice and to clarify the accounting for share-based payments which contain a performance target that could be satisfied after the requisite service period.

Our responses to the questions for all respondents and preparers of financial statements are included within the Appendix.

Thank you for your consideration of our responses.

Sincerely,

A handwritten signature in blue ink that reads "Roger L. VanCleave".

Roger L. VanCleave
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Appendix

The following represents our comments to the questions for all respondents and preparers of financial statements.

Questions for All Respondents

Question 1: Do you agree that a performance target that could be achieved after the requisite service period should be treated as a performance condition that affects vesting? If not, please explain why.

Unum Response: Yes, we agree that a performance target could be achieved after the requisite service period and that it should be treated as a performance condition that affects vesting. This aligns with the intent of a long-term incentive plan.

Question 2: Are there circumstances in which a performance target that could be achieved after the requisite service period should be treated as a nonvesting condition? If yes, please explain why.

Unum Response: We are not aware of any of these circumstances.

Question 3: The amendments in the proposed Update do not require any incremental disclosures for share-based payments in which a performance target could be achieved after the requisite service period. Should incremental disclosures be required for those awards? If yes, please explain why.

Unum Response: We do not believe that there should be any incremental disclosures associated with this amendment.

Question 4: Do you agree that the proposed amendments should be applied prospectively to all share-based payments granted or modified on or after the effective date? Should early adoption be permitted? Under the proposed Update, retrospective adoption would not be allowed. Should retrospective adoption be allowed? If yes, please explain why.

Unum Response: We agree that the proposed amendments should be applied prospectively to all share-based payments granted or modified on or after the effective date. We also believe that early adoption should be permitted. We agree that retrospective adoption should not be allowed because this could cause modification of outstanding grants.

Question 5: The proposed amendments would apply to public and nonpublic entities. Should the proposed amendments be different for nonpublic entities? If so, please describe how and why they should be different.

Unum Response: We believe the proposed amendments should apply to both public and nonpublic entities to maintain comparability.

Question 6: What is the level of effort and time needed to implement the proposed amendments?

Unum Response: Implementation of the proposed amendments would not require significant time or effort. We believe the efforts required to implement would be worth the clarification provided.