

December 1, 2014

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

File Reference No. 2014-260

Dear Ms. Cospers:

McGladrey LLP appreciates the opportunity to comment on the Proposed Accounting Standards Update, *Compensation—Retirement Benefits (Topic 715): Practical Expedient for the Measurement Date of an Employer’s Defined Benefit Obligation and Plan Assets* (the “proposed ASU”). We agree with the Board’s decision to provide a practical expedient for employers with fiscal year-ends that do not fall on a month-end which permits those employers to measure defined benefit plan assets and obligations as of the month-end that is closest to the entity’s fiscal year-end. We would, however, suggest that the Board consider providing a similar practical expedient to all benefit plans, including defined benefit plans, defined contribution plans and health and welfare plans, with fiscal year-ends that are also not a month-end as these employee benefit plans may also incur additional costs when measuring plan assets and obligations. We recommend that the proposed ASU be effective for annual periods ending after December 15, 2014 and that early adoption be allowed for financial statements that have not been issued.

As previously expressed, we continue to support the Board’s efforts to reduce complexity in accounting standards and encourage the Board to continue these efforts as part of its overall simplification initiative. We would be pleased to respond to any questions the FASB or its staff may have concerning our comments. Please direct any questions to Rick Day at 563.888.4017 or Ginger Buechler at 612.455.9411.

Sincerely,



McGladrey LLP