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2014-260
Cooment Letter No. 6
330 North Wabash, Suite 3200
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December 10, 2014

Via email to director@fasb.org

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

Re: Proposed Accounting Standards Update, *Practical Expedient for the Measurement Date of an Employer's Defined Benefit Obligation and Plan Assets* (File Reference No. 2014-260) ("the ED")

Dear Ms. Cospers:

We are pleased to provide comments on the proposal related to the measurement date of defined benefit obligations and plan assets. We support the Board's Simplification Initiative and welcome this proposed ASU as part of your Initiative.

Specifically, we agree that entities with fiscal year-ends that do not fall on a month-end should be permitted as a practical expedient to measure their defined benefit plan assets and obligations as of the month-end that is closest to their fiscal year-end. We recommend an employer be required to apply the practical expedient consistently to all plans if it has more than one, in order to achieve greater consistency.

Additionally, we support limiting adjustments to the funded status to contributions between the measurement date and the fiscal year end as that information is easily available to employers.

We recommend an employer be required to disclose the accounting policy election and the alternative date used for measuring defined benefit plan assets and obligations.

We further recommend the final guidance be effective in annual periods, and interim periods within those annual periods, beginning after December 15, 2014, with early adoption permitted for financial statements that have not been issued. Because the guidance represents an accounting policy election, we do not believe preparers will need an extended implementation period.

We would be pleased to discuss our comments with the FASB staff. Please direct questions to Liza Prossnitz at (312) 233-1818 or Adam Brown at (214) 665-0673.

Very truly yours,

BDO USA, LLP

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