



Via email to [director@fasb.org](mailto:director@fasb.org)

February 17, 2015

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

**File Reference No. 2014-270**

Dear Ms. Cospers:

This letter is submitted in response to the request for public comment by the Financial Accounting Standards Board with respect to its Exposure Draft of the proposed Accounting Standards Update Financial Services—Investment Companies (Topic 946), *Disclosures about Investments in Other Investment Companies*. WeiserMazars LLP appreciates the opportunity to review and comment on this Exposure Draft.

We are supportive of the FASB's objective to improve transparency and make the requirements consistent for investment companies that are regulated under the Investment Company Act of 1940, with those not regulated under that Act.

Thank you for this opportunity to provide comments on this Exposure Draft. We would be pleased to respond to any questions about our comments or if you wish to discuss any of the matters addressed herein, please contact Denise Moritz at (646) 225-5913 or Bonnie S. Mann Falk at (516) 620-8554, or Wendy Stevens at (212) 375-6699.

Our responses to the questions in the Exposure Draft are included for your consideration.

Very truly yours,

A handwritten signature in cursive script that reads 'WeiserMazars LLP'.

WeiserMazars LLP

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*Question 1: Do you agree that all feeder funds in a master-feeder arrangement (those that are regulated under the Investment Company Act of 1940 and those that are not regulated under that Act) should provide the financial statements of their master fund along with their own financial statements? Why or why not?*

**Response**

Yes. All feeder funds in a master-feeder arrangement (those that are regulated under the Investment Company Act of 1940 and those that are not regulated under that Act) should provide the financial statements of their master fund along with their own financial statements. The master feeder financial statements provide the investor, or potential investor, in the feeder the ability to gain a better understanding of their investment, and to assess the risks associated with the investment.

*Question 2: Do you agree that all investment companies (those that are regulated under the Investment Company Act of 1940 and those that are not regulated under that Act) should be required to disclose in their financial statements information about investments held by investee funds that exceed 5 percent of the reporting investment company's net assets? Why or why not?*

**Response**

Yes, disclosure of such information by all investment companies (those that are regulated under the Investment Company Act of 1940 and those that are not regulated under that Act) should be required. This will provide transparency and enable an investor to properly assess the risks associated with current or potential investments. Furthermore, such requirement establishes a benchmark for consistency of financial information provided by all investment companies.

*Question 3: Are the proposed disclosure requirements operable and auditable? If not, which aspects pose operability and/or auditability issues and why?*

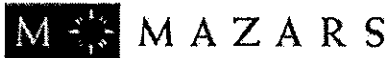
**Response**

Yes. The proposed disclosure requirements are operable and auditable if the underlying fund provides audited financial statements.

*Question 4: How much time would be necessary to implement the proposed amendments?*

**Response**

This information should be readily available from the underlying funds, therefore we recommend that, if adopted, that investment companies have one year prior to the effective date of any new requirements to implement the proposed amendments.



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*Question 5: Should the effective date for investment companies other than public business entities be one year after the first annual period for which public business entities are required to adopt the proposed amendments?*

**Response**

*Yes. The effective date for investment companies other than public business entities should be one year after the first annual period for which public business entities are required to adopt the proposed amendments.*

*Question 6: Do you agree that the proposed disclosure requirements should be applied prospectively and that early adoption should be permitted? Why or why not?*

**Response**

*Yes. The proposed disclosure requirements should be applied prospectively and early adoption should be permitted. Retroactive application would not necessarily provide decision useful information to the user of the financial statements and might be cost-prohibitive for entities to gather such data. Early adoption would be beneficial to the user of the financial statements, since the user will have a greater depth of information in which to assess the status and risk related to an investment in the investment company.*