



**BNP PARIBAS**  
**INVESTMENT PARTNERS**  
**TRUST COMPANY**

May 14, 2015

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

Re: Fully Benefit-Responsive Investment Contracts File Reference No. EITF-15C – I and Plan Investment Disclosures File Reference No. EITF-15C – II

Dear Ms. Cospers:

BNP Paribas Investment Partners Trust Company (the "Trust Company") is pleased to provide comments on the Fully Benefit-Responsive Investment Contracts File Reference No. EITF-15C – I and Plan Investment Disclosures File Reference No. EITF-15C – II.

The Trust Company thanks the FASB and staff for their diligence in understanding fully benefit responsive investment contracts that are used in stable value funds. We commend the Board and staff for their efforts to simplify and provide more meaningful information to defined contribution plan sponsors and participants and beneficiaries who use the financial statements for these fully benefit responsive investment contracts.

The Trust Company supports the comments and recommendations that the Stable Value Investment Association has provided in the Association's May 18<sup>th</sup> comments. The Trust Company urges the FASB Board and staff to incorporate SVIA's comments in the proposed exposure drafts: EITF-15C-I and EITF-15C-II.

Thank you for your consideration of the Trust Company's comments.

Sincerely,

**BNP Paribas Investment Partners Trust Company**

Name:

A handwritten signature in black ink, appearing to read "James Baillie".

Title:

CFO/Treasurer