

MORLEY FINANCIAL
SERVICES, INC.

May 15, 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:

Morley Financial Services (Morley) 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.

Morley 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, participants and beneficiaries who use the financial statements for these fully benefit responsive investment contracts.

Morley has over 30 years of stable value experience tracing our history back to 1982. We provide comprehensive stable value solutions to more than 12,000 defined contribution plan sponsors. We are dedicated to constructing portfolios with capital preservation objectives that are designed to help investors achieve retirement goals. Our devotion to the capital preservation marketplace has established our firm as a valued leader in the industry.

Morley supports the comments and recommendations that the Stable Value Investment Association (SVIA) has provided in their May 18th comments. Morley urges the FASB 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 Morley's comments.

Sincerely,



Ron Heath
President