

Three Proposed Accounting Standards Updates, Plan Accounting: Defined Benefit Pension Plans (Topic 360), Defined Contribution Pension Plans (Topic 962), Health and Welfare Benefit Plans (Topic 965) I. Fully Benefit-Responsive Investment Contracts, II. Plan Investment Disclosures, and III. Measurement Date Practical Expedient

| Question Text   | Response                |
|---|-------------------------|
| * Please select the type of entity or individual responding to this feedback form.  | Accounting Firm/Auditor |
| Other, please specify (Specified)   |                         |
| * Please provide contact information for any follow-up questions.   | (Filled in as Follows:) |
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| 1. Should the requirements to present and disclose fully benefit-responsive investment contracts at fair value be eliminated? If not, please explain why. | Yes                     |

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| <p>2. Should the disclosure requirements for fully benefit- responsive investment contracts included in paragraphs 962-325-50-3 and 965-325-50-2 be reduced to eliminate disclosures relating to fair value measurements? If not, please explain</p> | <p>Yes</p> |
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| why.  |  |
| 3. Should any other disclosures be required for fully benefit-responsive investment contracts?  | The guaranteed interest rate and any restrictions on transacting at contract value.  |
| 4. Should the proposed amendments be applied retrospectively to all periods presented? If not, please explain why.  | Yes  |
| 5. How much time would be needed to implement the proposed amendments? Should early adoption be permitted?  | 2-4 hours per client.<br>Yes, early adoption should be permitted.  |
| Please provide any additional comments related to I. Fully Benefit- Responsive Investment Contracts   | We fully support the proposed updates. While we understand the initial intent of the current disclosure requirements, we believe that ultimately, it was found that little value was added by the FBR disclosures for the readers of the financial statements. |
| 1. Should investments be disaggregated only by general type, as required under Topics 960, 962, and 965 (that is, not by both general type and nature, characteristics, and risks)? If not, please explain why. | Yes  |

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| <p>2. Should self- directed brokerage accounts be classified as one general type of investment? If not, please explain why.</p>  | <p>Yes, because it is based on the choices of the individual participants who bear the risk and has little to no impact on the other participants.</p>  |
| <p>3. Should the requirements in Topics 960, 962, and 965 to disclose investments that represent 5 percent or more of net assets available for benefits be eliminated? If not, please explain why.</p>   | <p>No, we feel that disclosing the significant holdings of the Plan is helpful to Plan participants, management and other readers of the financials.</p>  |
| <p>4. If an investment is measured using the net asset value per share (or its equivalent) practical expedient in paragraph 820-10-35-59 and that investment is in a fund that files a Form 5500 as a direct filing entity, should the disclosure of that investment's significant investment strategies be required? If so, please explain why.</p> | <p>No</p>   |
| <p>5. Should the requirements in Topics 960, 962, and 965 to disclose the net appreciation or depreciation for investments by general type be</p>  | <p>We are neutral on this as we feel it may be helpful to the readers of the financial statements to understand how each type of investment is performing but this information can also be found elsewhere.</p> |

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| <p>eliminated? If not, please explain why.</p>  |  |
| <p>6. Should the proposed amendments be applied retrospectively? If not, please explain why.</p>  | <p>Yes</p>   |
| <p>7. How much time would be needed to implement the proposed amendments? Should early adoption be permitted?</p>   | <p>2-4 hours per client, depending on whether current year or retrospective.<br/>         Yes, early adoption should be permitted.</p> |
| <p>8. Are there any other improvements applicable to employee benefit plan accounting that should be considered for purposes of further simplifying financial reporting for employee benefit plans (for example, are there other disclosures that should be eliminated, amended, or added)?</p> | <p>No.</p>   |
| <p>Please provide any additional comments related to II. Plan Investment Disclosures:</p>   | <p>no other comments</p>   |
| <p>1. Should employee benefit plans be allowed to apply a measurement date practical expedient to measure</p>   | <p>Yes</p>   |

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| <p>investments and investment-related accounts using the month-end that is closest to the plan's fiscal year-end when the fiscal period does not coincide with a month-end? If not, please explain why.</p>                       |  |
| <p>2. Should plans only disclose (rather than recognize) contributions, distributions, and significant events that occur between the alternative measurement date and the plan's fiscal year-end? If not, please explain why.</p> | <p>Yes</p>   |
| <p>3. Should any other disclosures be required for plans that elect the practical expedient?</p>  | <p>No</p>  |
| <p>4. Should the proposed amendments be applied prospectively? If not, please explain why, and what transition method you would propose.</p>  | <p>Yes</p>   |
| <p>5. How much time would be needed to implement the</p>  | <p>Unsure of the time requirement. Early adoption should be permitted.</p> |

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| <p>proposed amendments? Should early adoption be permitted?</p>   |                           |
| <p>Please provide any additional comments related to III. Measurement Date Practical Expedient:</p>   | <p>No other comments</p>  |
| <p>Please provide any comments on the electronic feedback process:</p>  | <p>very user friendly</p> |
| <p>Below is a printable summary of your responses to the questions in this feedback form.</p> <p>You can revise your responses by clicking the "Back" button.</p> <p>All comments received constitute part of the FASB's public file. The FASB will make all comments publicly available by posting them to the Online Comment Letters portion of its website.</p> <p>If you are finished providing comments, click the 'Submit' button at the bottom of this page.</p> | <p>Not Answered</p>       |