



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:

Massachusetts Mutual Life Insurance Company (“MassMutual”) currently manages approximately \$148B of Retirement Assets with approximately \$38B of the assets invested in benefit responsive Stable Value investment contracts. We are 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.

As a long-time member of the Stable Value Investment Association (“SVIA”), MassMutual 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 FASB and staff for their efforts to simplify and provide more meaningful information to defined contribution plan sponsors, participants and beneficiaries who use or rely on the contract values reported in the financial statements for these fully benefit responsive investment contracts.

MassMutual supports the comments and recommendations that the SVIA has provided in the SVIA’s May 18th comments. MassMutual 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.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Aruna Hobbs', with a long horizontal line extending to the right.

Aruna Hobbs
Sr. Managing Director
MassMutual Financial Group
1295 State Street, M130
Springfield, MA 01111-0001

Cc: Stable Value Investment Association