PNC

April 25, 2016

Technical Director
Financial Accounting Standards Board
401 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116

File Reference No. 2016-210: Changes to the Disclosure Requirements for Defined Benefit Plans

Dear FASB Board Members and Staff:

The PNC Financial Services Group, Inc. ("PNC" or "we") appreciates the opportunity to comment on the Proposed Accounting Standards Update: Compensation – Retirement Benefits – Defined Benefit Plans – General (Subtopic 715-20): *Changes to the Disclosure Requirements for Defined Benefit Plans* ("Proposed ASU"). PNC supports the Financial Accounting Standards Board's ("the Board's") efforts to improve the effectiveness of disclosures. We believe that the Proposed ASU will help achieve the Board's overall objective of improving disclosure effectiveness.

Effective Decision Useful Information

As noted in our comment letter on File Reference No. 2015-310: Notes to Financial Statements (Topic 235): *Assessing Whether Disclosures are Material,* we support the Board's efforts in allowing entities to use discretion when assessing the materiality of disclosures. We believe that the Board's inclusion of explicit language stating that disclosures should be provided to the extent they are material will further the Board's objective of improving disclosure effectiveness. However, we believe further clarification on the matter of interim information could be provided by removing the explicit interim disclosure requirements under 715-20-50-6 within the Proposed ASU or cross referencing to the guidance in 715-20-50-1A within the Proposed ASU.

We support the inclusion of qualitative disclosure requirements which can support the underlying objective of providing useful information to financial statement users. For example, we agree with the Board that providing qualitative information on a plan's design, benefits, and employee coverage can provide insight into how these factors will affect future cash flow obligations.

We also support the Board's removal of disclosure requirements which do not meet the clearly useful information criterion. As such, we support the removal of the accumulated benefit obligation ("ABO") as a required disclosure. We believe investors use the defined benefit disclosures to gain insights into future cash flow burdens on a business based on the contractual arrangements that exist. Although ABO has limited alternative uses to investors, we believe the projected benefit obligation best represents future cash flow burdens as it includes assumptions of future compensation increases.

Costs and Benefits

We do not believe that the additional disclosure requirements will result in significant incremental costs. We already obtain much of the information that will be required to be disclosed and the other information should not require significant effort to obtain.

We believe the benefits will outweigh the incremental costs of the Proposed ASU. The Board's commitment to the Disclosure Framework Project is important since many new accounting standards (and corresponding new disclosures) will soon be effective for PNC such as ASU 2014-09 *Revenue from Contracts with Customers*, ASC 842 *Leases*, and the proposed amendments to ASC 825 *Financial Instruments*. To continue improving the effectiveness of disclosures provided, preparers must have confidence that streamlining and eliminating redundancy is an acceptable practice.

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We appreciate the opportunity to share our views with the Board. We welcome any questions or comments you may have on this letter. Please contact me (412.762.1622) with any questions about PNC's comments.

Sincerely,

Lauren Belot

Ms. Lauren Belot
Director of Accounting Policy
The PNC Financial Services Group, Inc.

cc: Mr. John (JJ) Matthews
Director of Finance Governance Oversight & Policy
The PNC Financial Services Group, Inc.

Mr. Gregory H. Kozich
Senior Vice President and Controller
The PNC Financial Services Group, Inc.