

April 25, 2016

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

Via Email to [director@fasb.org](mailto:director@fasb.org)

**Re: File reference number 2016-210**

Dear Ms. Cosper:

Grant Thornton LLP appreciates the opportunity to comment on the Proposed Accounting Standards Update (ASU), *Compensation – Retirement Benefits – Defined Benefit Plans - General (Subtopic 715-20): Changes to the Disclosure Requirements for Defined Benefit Plans*. We support the Board's objective to improve the effectiveness of sponsors' disclosures about defined benefit plans.

We believe that certain of the disclosure requirements that the Board proposes to remove from the Codification should be retained, as they, in our view, provide valuable information to investors at relatively little cost. In addition, it is our view that certain of the incremental disclosure requirements should be removed from the proposed guidance, as they are not cost beneficial. Our views are further explained in our responses to the Questions for Respondents, below.

**Question 1: Would the proposed amendments result in more effective, decision-useful information about defined benefit pension and other postretirement plans? If not, please explain why. Would the proposed amendments result in the elimination of decision-useful information about defined benefit pension and other postretirement plans? If yes, please explain why.**

We believe that the proposed amendments would result in the elimination of certain decision useful information.

First, we believe that the requirement to disclose the accumulated benefit obligation (ABO) should be retained because the ABO provides information about the effect of a potential curtailment, and is not costly for entities to provide.

Second, we believe that the requirement to provide related party disclosures about the amount of future annual benefits covered by insurance and annuity contracts, and significant



