



August 12, 2016

Ms. Susan Cospers
Technical Director
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

RE: File Nos. 2015-300, 2015-310

Dear Ms. Cospers:

We are submitting the following comments for the FASB's consideration in response to a request for comments on the proposals related to the definition of materiality (File Reference Nos. 2015-300 & 2015-310). These comments represent my perspective as an institutional investor for a large public pension plan representing more than 500,000 current and retired members and over \$45 billion in assets.

We would like to express our concerns on the proposed changes to the materiality standard as defined in the FASB's exposure draft. We believe that a materiality standard that includes both the terms "substantial" and "significantly" may provide the proper level of burden for a legal case, but provide too little protection to ensure comprehensive, quality disclosures from corporate fiduciaries to investors. Based on our interpretation of the proposal, the new standard of materiality will be significantly higher, and therefore has the potential to reduce disclosure, which we believe is a step in the wrong direction.

As both the ultimate consumer and payor of financial statement preparation and auditing, we believe the potential cost savings of a higher level of materiality do not compare to the risks associated with weaker disclosures. And while we appreciate the concerns the FASB has on the length of financial statements and their accompanying notes, we believe investors would prefer spending the extra time reading comprehensive filings rather than run the risk of non-disclosure. Clearly not all investors value the same information, and what may be important and material to our investment process may be different than what other investors focus on, which increases the need for a broad level of disclosure to fulfill the needs of all investors.

We appreciate the FASB allowing us the opportunity to comment on potential changes of the definition of materiality, and would welcome additional opportunities to provide input to the FASB as this process continues.

Sincerely,

A handwritten signature in blue ink that reads "Amy C. McGarrity".

Amy C. McGarrity
Deputy Chief Investment Officer
Colorado PERA