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September 30, 2016

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

RE: File Reference No. 2016-270

Dear Ms. Cospers:

PPG Industries, Inc. (PPG) is pleased to submit its comments on the FASB's *Proposed Accounting Standards Update, Income Taxes (Topic 740): Disclosure Framework – Changes to the Disclosure Requirements for Income Taxes*.

PPG acknowledges the FASB's desire to clarify the effectiveness of disclosures required by generally accepted accounting standards (GAAP) in the notes to the financial statements by facilitating clear communication of information that is most important to financial statement users. As a U.S. publicly traded company, several of the proposed disclosures are already required under Securities and Exchange Commission (SEC) regulations, including the requirement to disclose the foreign and domestic components of income tax expense. To the extent the proposed accounting standards update brings GAAP in line with SEC regulations, we are supportive of the proposed changes.

We believe the proposed requirement to disclose significant cash taxes paid to individual jurisdictions to be unnecessary and potentially misleading. Cash paid for income taxes can vary substantially year-to-year due to book-tax differences, audit settlements, estimated payments made for various periods, the utilization of existing tax attributes such as net operating losses and various other factors. In isolation, the disclosure of cash paid for income taxes can lead to a misinterpretation of the Company's tax positions and status with various tax jurisdictions around the globe. Further, disclosing cash taxes paid by country could create a competitive disadvantage given that customers, especially large customers, might use that information to estimate (correctly or incorrectly) profitability assumptions.

Similarly, we believe that the proposed requirement to disclose cash held by foreign subsidiaries could be misleading or construed to imply the foreign cash is available for immediate repatriation when in actuality the cash is restricted or designated for future investment. Finally, we believe the information that financial statements users need concerning cash taxes paid and cash held by foreign subsidiaries is already captured in the existing disclosure requirements of ASC Topic 740, Income Taxes and SEC regulations.

Thank you for the opportunity to express our comments. Should you have any questions, please contact me at 412-434-2119.

Sincerely,

A handwritten signature in blue ink that reads "Mark C. Kelly".

Mark C. Kelly
Vice President & Controller