10 Longs Peak Drive
Broomfield, Colorado

May 16, 2019

VIA EMAIL
director@fasb.org

Technical Director
File Reference No. 2019-500
FASB
401 Merritt 7
P.O. Box 5116
Norwalk, Connecticut 06856-5116

Dear Technical Director,

Thank you for the opportunity to respond to the proposed Accounting Standards Update (Revised), Income Taxes (Topic 740), Disclosure Framework – Changes to the Disclosure Requirement for Income Taxes (File Reference No. 2019-500). Ball Corporation ("Ball", "the company", "we" or "our") is a U.S. based Fortune 500, multi-national manufacturer of metal packaging products and of aerospace and other technologies and services with sales in 2018 of $11.6 billion and total assets of $16.5 billion, and is publicly traded on the New York Stock Exchange (NYSE: BLL).

The company supports the Financial Accounting Standards Board's ("FASB" or the "Board") objectives in its disclosure framework project to improve the effectiveness of disclosures in the notes to the financial statements by facilitating clear communication of information required by GAAP that is most important to users of each entity's financial statements. However, we also believe that the efforts of the disclosure framework project should align with the FASB's simplification initiative, and the updates that add or modify existing disclosure requirements in this proposed Accounting Standards Update generally do not result in additional useful information reported to investors and would drive increased costs and complexity in the disclosure process. We support the proposed amendments that would eliminate the required disclosures related to estimates of future changes in uncertain tax positions and certain deferred tax liabilities not recognized because of certain exceptions as we believe these changes align with simplification initiative. We have based the below responses and suggestions to the proposed Accounting Standards Update on our experience as a preparer of consolidated financial statements.

Overall, we believe the changes proposed in this update, which add or modify existing disclosure requirements, create additional requirements for filers without the benefit of providing users of the financial statements with more effective, decision-useful information about income taxes or performance of the company. Income taxes are a statutory requirement that are subject to variables outside a company's control (e.g. tax rate changes), and thus additional disclosures in this area will not provide information necessary to make more informed investment decisions that is not already found elsewhere in the financial statements. This position is supported by the fact that our company has received limited questions or expressions of interest from our investors regarding our current income tax disclosures in the past.

While we believe the proposed disclosure requirements are operable, the additional effort and cost to implement the changes outweighs the benefits Currently, the required information for certain additional disclosures and disaggregation of existing information is not readily available, creating the need for companies to not only update systems to gather the data, but also processes and controls to ensure accuracy of the data reported on a disaggregated basis As a result, companies will be burdened with increased costs related to both internal management and external auditors (e.g higher professional fees). Additionally, companies are already working against tight reporting timelines so the additional requirements could result in a delay in providing information to investors.

For certain of the questions for respondents that are not covered in our general response above, we've addressed below.

Question 5: The proposal of requiring disaggregation of income tax expense (or benefit) from continuing operations by major tax jurisdiction is operable; however, would lead to more confusion for the users of the financial statements and would not provide more decision-useful information. The definition of "major tax jurisdiction" is not clear and could be interpreted differently by companies compiling the disclosures and investors reading the information Further, this would potentially introduce a new level of reporting beneath segment reporting that would be of little value to the investor community. Additionally, management does not review financial performance by tax jurisdiction, thus we believe the current segment reporting requirements are the lowest level that should be used if additional income tax disclosures are required

Question 6: No; the 5% threshold for separate disclosures for any reconciling items computed by multiplying the income before tax by the applicable statutory federal income tax rate is appropriate and should not be changed.

Question 9: We do not agree with the change in scope of Topic 740 from *public entity* to *public business entity*. We understand this would require companies to include the proposed disclosures of entities not under their control solely because its financial statements or financial information are included in their filings It would create additional challenges in being able to rely on the information from these companies and confidently include this information in our public financial statements.

Question 10: The proposed disclosures, if finalized, should be required on a prospective basis only and not require restatement of prior periods The level of effort required by companies to gather historical information to provide retrospective disclosures greatly outweighs the benefit and will not provide users with additional decision-useful information.

Overall, we do not believe the proposed updates, which add or modify existing disclosure requirements, would provide investors with additional decision-useful information. However, we support companies being able to choose to provide the additional disclosures, while not required by all.

We appreciate your consideration of our comments and encourage you to contact us if you have any further questions

Sincerely,

Nate C. Carey
Vice President and Controller

John H. Wells
Vice President, Global Tax