



Ball Corporation

9200 W. 108<sup>th</sup> Circle, Westminster, CO 80021 (303) 460-2410 office

Reply to: P.O. Box 9005, Broomfield, CO 80021-0905

2021-004  
Comment Letter No. 47

September 21, 2021

VIA EMAIL  
director@fasb.org

Technical Director  
File Reference No. 2021-004  
FASB  
401 Merritt 7  
P.O. Box 5116  
Norwalk, Connecticut 06856-5116

Dear Technical Director,

Thank you for the opportunity to respond to the Invitation to Comment – *Agenda Consultation* (File Reference No. 2021-004). 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 2020 of \$11.8 billion and total assets of \$18.3 billion, and is publicly traded on the New York Stock Exchange (NYSE: BLL).

The company appreciates the Financial Accounting Standards Board’s (“FASB” or the “Board”) soliciting feedback about the future standard-setting agenda from stakeholders and users of financial statements. We have based the below responses and suggestions to the Invitation to Comment on our experience as a public company preparer of quarterly condensed consolidated financial statements and an issuer of quarterly earnings releases.

Disaggregation of Financial Reporting Information:

Overall, Ball typically aligns with the Board’s projects that focus on simplification while maintaining decision-useful information, rather than projects that add new requirements or change existing guidance without adding significant benefits for the users of the financial statements. Thus, we do not believe the additional granularity and disaggregation discussed in the Invitation to Comment is necessary to include in future projects, and the costs of implementing many of the suggested changes would outweigh the benefits.

Emerging Areas in Financial Reporting:

We support the Board adding the emerging areas to the technical agenda given the lack of authoritative guidance in those areas. Many of the accounting firms have published their own guidance on these topics (for example, guidance on how to account for certain environmental transactions), and thus we’d suggest the Board leverage this existing, published guidance while building out the authoritative accounting requirements. This would hopefully reduce the number of changes companies would need to make if they are already applying that guidance.

Reduction of Unnecessary Complexity in Current GAAP:



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As mentioned above, we are proponents of simplification wherever possible, as long as it does not reduce decision-useful information. As such, we support the Board pursuing the proposed topics. However, we'd suggest you request additional feedback on each topic given the complexities involved and to ensure the proposals actually lead to reduced complexity, rather than additional work to change current accounting with little reduction of complexity.

Improvements to FASB Standard-Setting Processes:

We support the enhancements to the FASB standard-setting process in this Invitation to Comment. Additionally, a process that was not included that we believe should be reviewed is the process around requesting stakeholder feedback through exposures drafts (e.g. invitations to comment and proposed accounting standard updates). While Ball actively comments on relevant topics, we've observed other public companies tend to not participate. We believe this is potentially because they do not want to participate on a public platform. To encourage more participation from public companies, which are the stakeholders most impacted by the majority of the proposed updates, we'd suggest introducing a way companies can respond in a non-public manner.

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

Sincerely,

A handwritten signature in black ink that reads "Nate C. Carey".

Nate C. Carey  
Vice President and Controller