

Record ID: 63769974622222006

Question Text	Response	Status
* Please select the type of entity or individual responding to this feedback form.	Not Asked	Not Asked
Other, please specify (Specified)		
* Please select the type of entity or individual responding to this feedback form.	Individual	Completed
Other, please specify (Specified)		
* Please provide contact information for any follow-up questions.	(Filled in as Follows:)	Completed
Organization *	Individual	
First name *	Cristian	
Middle initial	E.	
Last name *	Munarriz	
Email address *	cristian_munarriz@yahoo.com.ar	
Phone number		
Restriction Type: Do you agree with the Board's decision on scope to include all contractual restrictions that prohibit the sale of an equity security? Please explain why or why not.	<p>No. I disagree with the categorization between regulatory and contractual restrictions. I think the relevant thing to consider is not if the restriction is contractual or regulatory, but if the restriction is a characteristic of the equity security (and therefore it is transferrable to new holders of the equity security) or if it is a characteristic of the holder of the equity interest. All sale restrictions which are a characteristic of the equity security (and therefore transferrable to holders of the equity security) should be considered when estimating fair value whether of regulatory or contractual nature.</p> <p>I agree that restrictions of regulatory nature will be a characteristic of the equity security, but I think that not all contractual restrictions are a characteristic of the holder, but they may be a characteristic of the equity security in some circumstances. For example, a contractual restriction incorporated in the corporate documents which restricts the holding of the security to specific investors will affect the marketability of the equity security and the restriction will be transferred to new holders of the equity security. Therefore</p>	Completed

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	<p>it would be a characteristic of the asset, not of the holder, and should be considered when determining fair value. Therefore I think the reporting entity should consider if contractual sale restrictions are a characteristic of the asset and transferrable to new equity holders of the security (in which case it will adjust fair value), or if it is a characteristic of the holder of the equity interest (in which case it will be ignored).</p>	
<p>Measurement: Do you agree with the Board’s decision that a contractual restriction prohibiting the sale of an equity security is not considered part of the unit of account of the equity security and, therefore, should not be considered in measuring fair value? Alternatively, should the Board amend the guidance in Topic 820 (or elsewhere in GAAP) such that contractual sale restrictions would be required to be considered in determining fair value?</p>	<p>No, refer to my answer to question 1.</p>	<p>Completed</p>
<p>Entity Type: Should all types of entities use the same unit of account when measuring the fair value of an equity security subject to a contractual sale restriction, or should certain types of entities (for example, investment companies, broker dealers, and pension plan financial</p>	<p>The same rules should apply for all types of entities for comparability reasons.</p>	<p>Completed</p>

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<p>statements) have a different unit of account? Please explain your response.</p>		
<p>Disclosures: Would qualitative disclosures or quantitative disclosures (for example, describing the nature of a contractual sale restriction on an equity security and the related amount recognized on the balance sheet of a reporting entity) be helpful for users to understand the effects of a contractual restriction on the sale of an equity security held by a reporting entity? Please explain why or why not. For reporting entities, what costs would be incurred to disclose that information?</p>	<p>I do not think additional disclosures are needed.</p>	<p>Completed</p>
<p>Transition: Do you agree with the transition guidance in this proposed Update? Please explain why or why not.</p>	<p>I think the transition guidance should apply for all types of entities for comparability reasons, without different treatment for investment companies.</p>	<p>Completed</p>
<p>Implementation: How much time would be necessary to implement the proposed amendments? Should the amount of time needed to implement the proposed amendments by entities other than</p>	<p>I think there is little time and cost expected for implementing the amendments for any type of entities.</p>	<p>Completed</p>

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<p>public business entities be different from the amount of time needed by public business entities? Please explain your response.</p>		
<p>Clarity and Operability: Do you agree that the proposed amendments and, in particular, the definition of a restricted security provide the necessary clarity to resolve existing diversity in practice? Please explain why or why not. Are the proposed amendments operable and auditable? If not, which proposed amendment or amendments pose operability or auditability issues and why?</p>	<p>No, refer to my answer to question 1.</p>	<p>Completed</p>
<p>Please provide any additional comments on the Proposed Update:</p>		<p>Completed</p>
<p>Please provide any comments on the electronic feedback process:</p>		<p>Completed</p>