

April 25, 2016

Susan M. Cospers, CPA
Technical Director
FASB
401 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116

Re: January 26, 2016 Exposure Draft of a Proposed Accounting Standards Update (ASU), *Compensation—Retirement Benefits—Defined Benefit Plans--General (Subtopic 715-20): Changes to the Disclosure Requirements for Defined Benefit Plans* [File Reference No. 2016-210]

Dear Ms. Cospers:

The American Institute of CPAs (AICPA) is the world's largest member association representing the accounting profession, with more than 412,000 members in 144 countries, and a history of serving the public interest since 1887. One of the objectives that the Council of the AICPA established for the PCPS Executive Committee is to speak on behalf of local and regional firms and represent those firms' interests on professional issues in keeping with the public interest, primarily through the Technical Issues Committee (TIC). This communication is in accordance with that objective. These comments, however, do not necessarily reflect the positions of the AICPA.

TIC has reviewed the ED and is providing the following comments for your consideration.

TIC is supportive of the proposed changes in this ED. The added disclosures will be helpful to financial statement users and will not be costly or difficult to implement by private entities. TIC also agrees with the disclosures selected for elimination since they have not been decision-useful to stakeholders. TIC is especially pleased that nonpublic entities will no longer have to disclose the reconciliation of the opening balances to the closing balances of plan assets measured on a recurring basis in Level 3 of the fair value hierarchy. TIC did not identify any other disclosures that should be eliminated.

The Board's deliberations regarding the transition period should take into consideration the amount of time necessary to educate actuaries on the changes and make the required system changes to reflect the updated disclosures in their report templates. TIC recommends an effective date for nonpublic entities that is one year after the effective date for public entities to allow appropriate time for awareness and education. However, TIC supports early adoption if the actuary and the employer are ready to implement the new standard.

TIC appreciates the opportunity to present these comments on behalf of PCPS member firms. We would be pleased to discuss our comments with you at your convenience.

Sincerely,

A handwritten signature in black ink that reads "Michael A. Westervelt". The signature is written in a cursive, slightly slanted style.

Michael A. Westervelt, Chair
PCPS Technical Issues Committee
cc: PCPS Executive and Technical Issues Committees