November 30, 2012

To: Technical Director
Financial Accounting Standards Board
401 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116

Via Email: director@fasb.org

Re: Disclosure Framework Discussion Paper

File Reference No. 2012-220

Thank you for the opportunity to comment on the Disclosure Framework Discussion Paper ("Discussion Paper").

I work in an external reporting function at a publicly traded technology company. The views presented below are my own and do not necessarily represent those of my employer or any of my colleagues.

Responses to selected questions accompanying the Discussion Paper are presented below.

## Question 16: Do you think that any of the possibilities in this chapter would improve the effectiveness of disclosures for interim financial statements?

Response to Question 16: I agree with the assessment of the volume of interim disclosures presented in Discussion Paper paragraph 6.8. Generally, I believe that moving to a similar type of analysis required by Regulation S-X Rule 10-01, noted in paragraph 6.26 of the Discussion Paper, would allow preparers, in some situations, to self-assess the materiality of certain interim disclosures.

I do, however, believe that such a scheme would only be an incremental improvement over the current state if the process of disclosure controls envisaged in Discussion Paper paragraph 6.28 is less costly to implement than the process of simply providing the currently required disclosures themselves. It may be the case in some circumstances that the least costly approach for a preparer would be to simply provide a given disclosure rather than take the time to justify the reasons for not including the disclosure.

Question 17: If you think that a framework for the Board's use in deciding on disclosure requirements for interim financial statements would improve the effectiveness of interim reporting, what factors should the Board consider when setting disclosure requirements for interim financial statements?

Response to Question 17: I suggest that the Board consider the tight deadlines for companies filing quarterly reports on Form 10-Q. The proliferation of Accounting Standards Updates ("ASUs") requiring increased disclosure is adding an incremental burden on preparers with no incremental time allowed each quarter for companies to comply.

I appreciate that the Board noted the tight filing deadlines for interim reports in Discussion Paper paragraph 6.6, and also appreciate the Board's assessment, in Discussion Paper paragraph 6.8, of the volume of interim disclosure requirements in recently issued ASUs. Given the Board's sensitivity around filing deadlines, I hope the Board will consider the usefulness of issuing ASUs with incremental disclosure requirements (whether interim or annual) until it has decided whether to implement a disclosure framework. For example, I was interested to learn that the Board intends to require certain enhanced disclosures about accumulated other comprehensive income for interim periods. Regardless of the usefulness of these disclosures, I am surprised that the Board has not allowed for implementation of a disclosure framework (or abandonment of the disclosure framework project) before instituting incremental disclosure requirements that preparers may later deem unnecessary if a disclosure framework is in place.

Another factor I suggest the Board consider is duplication in disclosure requirements between U.S. GAAP and SEC regulations. For example, given the similarities between existing disclosure requirements under Regulation S-K and the proposed disclosures in the *Accounting for Financial Instruments: Liquidity and Interest Rate Disclosures* project, I believe that investors' desires for certain information in interim periods could be better met through joint efforts by standard setters to work in a unified manner and eliminate redundancy in disclosure requirements.

Respectfully submitted,

Rick Snow, CPA

<sup>&</sup>lt;sup>1</sup> Summary of Board Decisions, November 14, 2012 FASB Board Meeting, <<a href="http://www.fasb.org/cs/ContentServer?c=FASBContent">http://www.fasb.org/cs/ContentServer?c=FASBContent</a> C&pagename=FASB%2FFASBContent C%2FActionAlertP age&cid=1176160511970>, accessed November 30, 2012.