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2013-200
Comment Letter No. 5
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January 22, 2013

Leslie Seidman, Chairman
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116
Via email: director@fasb.org

RE: File Reference No. 2013-200: *Clarifying the Scope and Applicability of a Particular Disclosure to Nonpublic Entities*

Dear Chairman Seidman:

The American Bankers Association (ABA) appreciates the opportunity to comment on the Exposure Draft *Clarifying the Scope and Applicability of a Particular Disclosure to Nonpublic Entities (ED)*. ABA represents banks of all sizes and charters and is the voice for our nation's \$14 trillion banking industry and its two million employees.

The objective of the ED is to clarify that the requirement to disclose “the level of the fair value hierarchy within which the fair value measurements are categorized in their entirety (Level 1, 2, or 3)” does not apply to nonpublic entities for items that are not measured at fair value in the statement of financial position but for which fair value is disclosed. With that in mind, the ABA agrees with the clarification provided in the ED and believes that this change will clear up confusion in applying the applicable disclosure requirements. We recommend that the scope clarifications be effective as proposed, which is upon issuance.

Thank you for your attention to these matters. Please feel free to contact me (mgullette@aba.com; 202-663-4986) if you would like to discuss our views.

Sincerely,

A handwritten signature in black ink that reads 'Michael L. Gullette'.

Michael L. Gullette