FASB Fair Value Measurement - Deferral

Date of Entry: 5/22/2013

Respondent information

Type of entity or individual:

Industry Organization

Contact information:

Organization: Recology

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Questions and responses

1. Do you agree with the indefinite deferral, as well as the Board's decision to defer for investments held by nonpublic employee benefit plans, only the quantitative information about the significant unobservable inputs used in Level 3 fair value measurement of its plan sponsor's own nonpublic entity equity securities, and not the qualitative information, required by paragraph 820-10-50-2(bbb)? Why or why not?

Yes, I agree with it. Having nonpublic employee benefit plans publicly report this sensative and confidential information would allow third parties to potentially harm Recology and its' employee owners due to that disclosure.

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2. Do you agree with the limited scope of plan sponsor's own nonpublic entity equity securities covered by the proposed Update? If not, what other investments should be included or excluded from the guidance in the proposed Update and why?

Yes, as that information is what could potentially harm nonpublic employee benefit plans.

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3. Do you agree with the scope of the employee benefit plans in this proposed Update? If not, which other employee benefit plans should be included or excluded from the guidance in the proposed Update and why?

Yes, it is appropriate and reasonable.

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4. Do you agree with the definition of nonpublic employee benefit plan? Is it understandable and operable?

Yes - it is understandable and operable.

Additional comments-updt. Please provide any additional comments on the proposed Update:

As a private company we are very much concerned about sensative and confidential information being made public to 'third parties' that could then be used in ways that could harm Recology and its' employee owners.

Additional comments - process.	Please provide any comments on the electronic feedback process:

It works well.