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May 29, 2013

Ms. Susan M. Cospers  
Technical Director  
Financial Accounting Standards Board  
401 Merrit 7  
Norwalk, CT 06856-5116

**File Reference No. 2013-260**

**Re: Proposed Accounting Standards Update, *Deferral of the Effective Date of Certain Disclosures for Nonpublic Employee Benefit Plans in Update No. 2011-04***

Dear Ms. Cospers:

Deloitte & Touche LLP appreciates the opportunity to respond to the FASB's proposed Accounting Standards Update (ASU) *Deferral of the Effective Date of Certain Disclosures for Nonpublic Employee Benefit Plans in Update No. 2011-04*. We support the Board's efforts to address the concern that as a result of ASU 2011-04, entities with nonpublic employee benefit plans would be required to disclose proprietary information about their own nonpublic employer sponsors. However, we recommend that instead of indefinitely deferring the effective date for such disclosures, the FASB exempt nonpublic employee benefit plans from the requirement in ASC 825-10-50-2(bbb) to provide quantitative information about significant unobservable inputs used in Level 3 fair value measurements for equity securities issued by the plans' own nonpublic employer sponsors. An exemption is clearer and less likely to be overlooked in the *FASB Accounting Standards Codification*.

This recommendation addresses questions 1 through 3 in the proposed ASU's Questions for Respondents. In response to question 4, we agree with the proposed definition of "nonpublic employee benefit plan."

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Deloitte & Touche LLP appreciates your consideration of our comments on the proposed ASU. If you have any questions, please contact Adrian Mills at (203) 761-3208.

Yours truly,  
Deloitte & Touche LLP

CC: Robert Uhl