

**From:** [Corey Tremaine](#)  
**To:** [Director - FASB](#)  
**Subject:** FASB Proposal EITF100C  
**Date:** Thursday, August 26, 2010 11:41:52 AM

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Questions 1 – 3 -

I agree 100% with your proposal to allow/force benefit plans to classify participant loans as note receivable, rather than investments subject to fair value disclosures.

No trustees/custodians were valuing these loans at fair value anyway, (they were carrying these at amortized cost). So your accounting rule will make the financial statements align with what is actually happening. Additionally, the fair value disclosures for participant loans were/are meaningless. (loans did not appreciate or depreciate in value, since the TPA's value these at amortized cost)

Question 4 –

I agree that this should be retrospectively & that early adoption should be allowed. That is because the current fair value disclosures are meaningless.

Question 5 –

The time to implement would be roughly 1-2 hours per plan that I'm involved with.

Thank you

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