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January 22, 2013

Ms. Susan M. Cospers
Technical Director
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

File Reference No. 2013-200

Re: Proposed Accounting Standards Update *Clarifying the Scope and Applicability of a Particular Disclosure to Nonpublic Entities*

Dear Ms. Cospers:

Deloitte & Touche LLP is pleased to comment on the FASB's proposed Accounting Standards Update (ASU) *Clarifying the Scope and Applicability of a Particular Disclosure to Nonpublic Entities*.

On the basis of the Board's conclusion that for nonpublic companies the incremental benefit of disclosing information about the fair value hierarchy levels for fair value measurements that are disclosed (but not measured at fair value in the statement of financial position) does not outweigh the costs of providing such disclosures, we support the Board's decision in the proposed ASU to exempt nonpublic entities from the requirement to disclose the aforementioned information. All other fair value disclosure requirements for nonpublic entities, including information about the fair value hierarchy levels for fair value measurements presented in the balance sheet, should be retained at this time. Additional amendments to the fair value disclosure requirements for nonpublic entities should only be made after consideration of any feedback from constituents on the Board's pending exposure draft on classification and measurement and from the Private Company Council.

We support the proposed ASU's effective date and transition.

Thank you for the opportunity to comment on the proposed ASU. If you have any questions concerning our comments, please contact Adrian Mills at (203) 761-3208.

Yours truly,

Deloitte & Touche LLP

cc: Bob Uhl