FASB Fair Value Measurement - Deferral

Date of Entry: 5/2/2013

Respondent information

Type of entity or individual:

Employee Owned Company

Contact information:

Organization: TMI Hospitality, Inc.

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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 the indefinite deferral. Paragraph 820-10-50 requires nonpublic benefit plans, particularly ESOPs, to disclose proprietary information used in the annual valuation of the sponsoring private company. The required disclosure of assumptions used in determining the fair value could be used by competitors or potential strategic or financial buyers allowing them to perform their own valuation of the company. This could be used to the detriment of the employee owners.

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.

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. Nonpublic Benefit Plans, such as ESOPs

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

    Yes.

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

Additional
comments - process.

Please provide any comments on the electronic feedback process:

Very easy to use.