July 10, 2015

Technical Director
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, Connecticut 06856-5116

File Reference No. 2015-260
Proposed Accounting Standards Update, Business Combinations (Topic 805): Simplifying the Accounting for Measurement-Period Adjustments

Liberty Global plc (LG) appreciates the opportunity to comment on the Proposed Accounting Standards Update, "Business Combinations (Topic 805): Simplifying the Accounting for Measurement-Period Adjustments" (the Proposed ASU) issued by the Financial Accounting Standards Board (FASB). LG is an international provider of video, voice and broadband Internet services, serving over 27 million customers across 14 countries. We have grown our business significantly through both organic growth and a number of large acquisitions. This strategy will continue in the future.

LG would like to express its appreciation to the Board for its efforts to identify, evaluate and improve areas of generally accepted accounting principles (GAAP) for which cost and complexity can be reduced.

We support the Board’s tentative decisions and reasoning as drafted in the Proposed ASU. Specifically, we agree with the amendments in the Proposed ASU to recognize adjustments made to provisional amounts identified during the measurement period of a business combination in the reporting period they are determined. The costs and complexity associated with recording such adjustments retrospectively far outweigh the benefits to the user of our financial information and the restatement of previously issued financial information is potentially confusing to the users of our financial information. We also believe that the prospective recording of adjustments to provisional amounts is consistent with the concept underlying the accounting for changes in accounting estimates. Finally, narrative disclosure accompanying any significant prospective adjustments would provide adequate information of the impact of measurement period changes to the users of our financial information.
As the proposed ASU is effective in achieving the objectives of the Simplification Initiative and is not difficult to implement, we support the immediate effectiveness of this ASU upon issuance.

We appreciate the opportunity to provide you with our views on the Proposed ASU. If you have any questions regarding our comments, please contact me at 303-220-6603, Leo Stegman at 303-220-6690, or Brian Zook at 303-220-6632.

Sincerely,

Bernard G. Dvorak
Executive Vice-President & Co-Chief Financial Officer

cc  Leo Stegman, Managing Director, Accounting and Reporting
    Brian Zook, Vice President, Accounting Policy
    Rick Ehrman, KPMG