April 25, 2016

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

Via Email to director@fasb.org

**Re: File reference number 2016-210**

Dear Ms. Cosper:

Grant Thornton LLP appreciates the opportunity to comment on the Proposed Accounting Standards Update (ASU), *Compensation – Retirement Benefits – Defined Benefit Plans - General (Subtopic 715-20): Changes to the Disclosure Requirements for Defined Benefit Plans*. We support the Board’s objective to improve the effectiveness of sponsors’ disclosures about defined benefit plans.

We believe that certain of the disclosure requirements that the Board proposes to remove from the Codification should be retained, as they, in our view, provide valuable information to investors at relatively little cost. In addition, it is our view that certain of the incremental disclosure requirements should be removed from the proposed guidance, as they are not cost beneficial. Our views are further explained in our responses to the Questions for Respondents, below.

**Question 1: Would the proposed amendments result in more effective, decision-useful information about defined benefit pension and other postretirement plans? If not, please explain why. Would the proposed amendments result in the elimination of decision-useful information about defined benefit pension and other postretirement plans? If yes, please explain why.**

We believe that the proposed amendments would result in the elimination of certain decision useful information.

First, we believe that the requirement to disclose the accumulated benefit obligation (ABO) should be retained because the ABO provides information about the effect of a potential curtailment, and is not costly for entities to provide.

Second, we believe that the requirement to provide related party disclosures about the amount of future annual benefits covered by insurance and annuity contracts, and significant
transactions between the employer and the plan, should be retained. In our view, these disclosures provide decision useful information if a plan has significant related party transactions. We note that the Board’s basis for removing this disclosure requirement is that it is not broadly applicable. We believe that entities for which this disclosure requirement is not applicable are currently permitted to exclude these disclosures from their financial statements, and that for entities for which this disclosure requirement is applicable, it conveys decision useful information to financial statement users.

We agree with the Board’s remaining proposed deletions from current defined benefit plan disclosure requirements.

We also believe that the proposed amendments would require the disclosure of additional information that is not cost beneficial. Specifically, while we agree that requiring disclosures about plan assets measured using the net asset value (NAV) practical expedient is consistent with the requirements to provide other fair value disclosures about plan assets, we believe that restrictions on redemption of plan assets typically have a significantly different impact on the sponsor than a restriction on redemption of sponsor-owned assets. Typically the plan assets are not available to the sponsor or its shareholders, and therefore information about restrictions on redeeming plan assets measured under the NAV practical expedient is less decision useful to users of the sponsor’s financial statements.

**Question 2: Are the proposed disclosure requirements operable and auditable? If not, which aspects pose operability or auditability issues and why?**

We believe the proposed disclosure requirements are operable and auditable.

**Question 3: Would any of the proposed disclosures impose significant incremental costs? If so, please describe the nature and extent of the additional costs.**

We do not believe the proposed disclosure requirements would impose significant incremental costs.

**Question 4: Are there any other disclosures that should be required by Subtopic 715-20 on the basis of the proposed Concepts Statement or for other reasons? Please explain why.**

We are not aware of any other disclosures that should be required under ASC 715-20.

**Question 5: Are there any other disclosure requirements retained following the review of Subtopic 715-20 that should be removed on the basis of the proposed Concepts Statement or for other reasons? Please explain why.**

We are not aware of any other disclosure requirements that should be removed from ASC 715-20.
Question 6: How much time would be needed to implement the proposed amendments? Should the amount of time needed to implement the proposed amendments by nonpublic entities be different from the amount of time needed by public entities? Should early adoption be permitted? If yes to either question, please explain why.

We do not believe entities will require significant time to implement the proposed amendments, although we defer to preparers to advise the Board whether significant time will be needed to compile the information needed to apply the proposed guidance.

We believe that early adoption should be permitted, as the amended guidance, considering our response to Question 1, provides more relevant and decision-useful information to financial statement users.

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We would be pleased to discuss our comments with you. If you have any questions, please contact Ryan Brady, Senior Manager, 312.602.8741 or ryan.brady@us.gt.com.

Sincerely,

/s/ Grant Thornton LLP