September 26, 2016

Susan M. Cosper, Technical Director  
File Reference No. EITF-16B  
Financial Accounting Standards Board  
401 Merritt 7  
PO Box 5116  
Norwalk, Connecticut 06856-5116

Submitted via electronic mail to director@fasb.org


Dear Technical Director:

General Motors Company (“GM”) designs, builds and sells cars, trucks, crossovers, and automobile parts worldwide. We also provide automotive financing services through General Motors Financial Company, Inc. More information on GM and its subsidiaries can be found on our website at http://www.gm.com.

GM’s United States defined benefit plans are one of the largest for a private enterprise in the United States with over $61 billion in pension plan assets as of December 31, 2015. We appreciate the opportunity to comment on the Proposed ASU and note that the proposed changes will impact GM’s master trust disclosures included in our individual employee benefit plan reports.

Overall, we support the Board’s proposal to expand certain disclosure requirements for benefit plans with divided interests in master trusts and eliminate certain others for the underlying investments held by a master trust. We believe these changes meet the Board’s objective to improve the usefulness of the information reported to users of employee benefit plan financial statements. We do not anticipate incurring significant costs as a result of these amendments as the additional information required to provide the additional disclosures is readily available.

As to the additional disclosure requirement, we believe the proposal to require additional disclosure of the amounts of a plan’s divided interest in the underlying investments of a master trust by general type and its other assets and liabilities is more appropriate than the current requirement to only disclose a
plan’s ownership interest of the total net assets of the master trust. The proposed disclosure requirement provides more transparency of the composition of a plan’s master trust investment by reducing the potential for misleading the user to assume that the ownership interest of the total net assets is reflective of the plan’s divided interest in the underlying investments, which is not always the case.

We support the proposed elimination of other disclosures as required by Topic 815, Derivatives and Hedging, and Topic 820, Fair Value Measurement (e.g., the disclosure of master trust investments by fair value hierarchy level, as well as activity attributable to Level 3 investments). The underlying investments held by a master trust are more appropriately disclosed within master trust financial statements and we believe the result is consistent with related regulatory reporting. Furthermore, it is our view that disclosing the fair value hierarchy level of an investment in a master trust is not meaningful as the fair value of a master trust is a result of the fair values of its underlying investments which could be categorized within all levels of the fair value hierarchy. We believe these changes would not affect the “decision-useful information” in the financial statements, and would help to simplify the preparation of disclosures.

As a result of the simplification initiatives already implemented by the Board and the changes outlined in the Proposed ASU, we consider the proposed master trust disclosures to have the appropriate level of detail which provides sufficient transparency and information useful to investors.

Thank you for the opportunity to provide comments and we appreciate the Board’s consideration of the points outlined in this letter. Should you have any questions or need to discuss this letter, please contact me at (313) 667-3434.

Sincerely,

[Signature]

Thomas S. Timko
Vice President, Controller and Chief Accounting Officer
General Motors Company