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?

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?

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?

   E.S.O.P. plans should be excluded from the disclosure rules as they contain confidential information that would not otherwise be available and should not be available to the public or other participants.

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

   No it needs to be more specific.

Additional comments - updt.

Please provide any additional comments on the proposed Update:

This measure is too broad in scope and should be exclusive of certain types of entries, i.e. E.S.O.P. S-Corp plans.

Additional comments - process.

Please provide any comments on the electronic feedback process: