FASB Fair Value Measurement - Deferral

Date of Entry: 5/3/2013

Respondent information

Type of entity or individual:

Individual

Contact information:

Organization: Burns & McDonnell Engineering

Name: Denny Scott

Email address: dscott@burnsmcd.com

Phone number:

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?

I agree with the indefinite deferral provision for nonpublic companies. Certian data from privately held companies contain sensitive and confidential information that could create situations where the company or its employee owners could be harmed.

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. Nonpublic company equity information if confidential and should not be shared outside of the ownership ranks.

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?

As stated above, nonpublic company information should be kept confidential.

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

Yes. It is both understandable and operable.

Additional Please provide any additional comments on the proposed Update:

comments-updt.

Additional Please provide any comments on the electronic feedback process: comments - process.