

FASB Fair Value Measurement - Deferral

Date of Entry: 5/17/2013

Respondent information

Type of entity or individual:

ESOP S Corp.

Contact information:

Organization: Thomas & Skinner, Inc.

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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?

Yes. This 111 year old employee owned company feels that this update resolves the issue that privately held companies with ESOP's face in that sensitive confidential information would be made public and could be used by third parties in ways that could harm our company and its 147 employee owners.

 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

 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?

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

Yes

- Additional comments-updt. Please provide any additional comments on the proposed Update:

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