

FASB Fair Value Measurement - Deferral

Date of Entry: 5/24/2013

Respondent information

Type of entity or individual:

Corporation that would be effected.

Contact information:

Organization: H&C Tool Supply Corp.

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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?

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?

We believe that ESOP's should be excluded from the scope of the update. Not only would ESOP's be subjected to extraordinary cost increases of certain valuation services, as well as possible deterioration of the support framework for ESOP's, the public posting of supporting financial reports would lay bare private corporate information that would create competitive imbalances to the detriment of the very individuals the regulations are trying to protect.

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

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

Thank you for considering our input. We believe that ESOP's are a wonderful option for our employees, and that in the future more companies will be encouraged to follow this route to the benefit of all.

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