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March 10, 2017

Technical Director  
Financial Accounting Standards Board  
401 Merritt 7  
PO Box 5116  
Norwalk, CT 06856-5116  
Electronic Address: [director@fasb.org](mailto:director@fasb.org)

RE: File Reference No. 2017-210, Inventory (Topic 330); Disclosure Framework – Changes to the Disclosure Requirements for Inventory

The Williams Companies, Inc. (Williams) appreciates the opportunity to provide our comments to the Financial Accounting Standards Board (Board) on the proposal modifying the disclosure requirements for inventory. Williams is a public company which, through its subsidiaries, gathers, processes and transports natural gas, and produces olefins.

We support the Board's disclosure framework project to improve the effectiveness of disclosures and generally support the additional disclosures in the proposal. However, we have comments on certain of the proposed disclosure changes as follows.

#### Changes in Inventory


We agree with the Board's conclusion not to require a detailed roll-forward of the inventory balance. We believe disclosing specific changes outside the ordinary course of business is a preferable approach as this would provide information about unusual items and avoid the preparation cost of accumulating detailed information about a voluminous number of transactions occurring in the normal course of business. We do believe the Board should provide further guidance or background information around the principles based intent of paragraph 330-10-50-7. For example, would an adjustment to inventory from a lower of cost and net realizable value measurement as a result of recurring changes in market prices represent an event outside the normal course of purchasing, manufacturing or selling inventory or represent an atypical loss from the subsequent measurement of inventory? Would the significance of the market price change influence the determination of whether or not the loss is normal course or atypical?

Transition and Effective Date

We agree that the amendments in the proposal should be applied prospectively. We believe an effective date for public business entities should be for periods no earlier than 2019, however, early adoption should be permitted.

We appreciate the opportunity to comment on these matters and would be happy to provide any additional information you may require or discuss our comments further.

Sincerely,



Ted Timmermans  
Vice President, Controller and Chief Accounting Officer  
The Williams Companies, Inc.