10 Longs Peak Drive
Broomfield, Colorado

March 13, 2017

VIA EMAIL

Ms. Susan M. Cosper
Technical Director
File Reference No. 2017-330
Financial Accounting Standards Board of
The Financial Accounting Foundation
401 Merritt 7
P.O. Box 5116
Norwalk, Connecticut 06856-5116

Dear Technical Director:

Thank you for the opportunity to respond to the Exposure Draft: *Inventory (Topic 330): Disclosure Framework – Changes to the Disclosure Requirements for Inventory*. Ball Corporation ("Ball," "the company," "we" or "our") is a U.S.-based Fortune 500, multi-national manufacturer of metal packaging products and of aerospace and other technologies and services with sales in 2016 of $9.1 billion and total assets of approximately $16.2 billion, and is publicly traded on the New York Stock Exchange.

We support the Financial Accounting Standards Board's ("FASB" or the "Board") objective to improve the effectiveness of disclosures in the notes to financial statements as part of the disclosures framework project. Following are our responses to certain of the questions posed in the Inventory (Topic 330) Exposure Draft. Please note we intentionally have only responded to the questions posed in the Exposure Draft for which we have a perspective.

Question 1: Would the amendments in this proposed Update result in more effective, decision-useful information about inventory? Please explain why or why not.

We agree with the Board's proposal for reporting inventory disaggregated by component, however, we do not agree with the Board's proposal for reporting inventory disaggregated by measurement basis, or reporting changes to the inventory balance that are not specifically related to the purchase, manufacture, or sale of inventory in the ordinary course of business. We do not believe these changes would be decision useful to investors relative to the incremental cost that would be incurred to comply with these changes. Additionally, we do not see a significant benefit to adding a qualitative description of the types of costs capitalized into inventory.

Question 2: Are the proposed disclosure requirements operable and auditable? If not, which aspects pose operability or auditability concerns and why?

We are not aware of any aspects of the proposed disclosure requirements which are not operable and auditable. The proposed rollforward as described could pose an additional burden to preparers in terms of costs incurred in capturing and compiling data.

Question 3: Would any of the proposed disclosures impose significant incremental costs? If so, please describe the nature and extent of the additional costs.

We believe there is an incremental cost to comply with the proposed disclosures. Our company will incur costs to capture, accumulate, validate and report the information included in the disclosures in addition to incurring costs associated with auditing the proposed disclosures.

Question 4: Paragraph 330-10-50-7 proposes a requirement to disclose certain specific changes in the inventory balance. Is this requirement sufficiently operable? Why or why not? Would a requirement to include a rollforward of inventory impose significantly greater costs? If so, please describe the nature and extent of the additional costs. Would the informational benefit of a rollforward be sufficient to justify the additional costs? Are there other ways to provide users with this information without imposing significant incremental costs, and, if so, what are they?

The requirement proposed is operable, but would require additional resources to aggregate and prepare the information. A rollforward of inventory would also have costs associated with preparing and auditing the disclosure. We do not believe the benefit associated with this information will ultimately justify the incremental costs.

Question 5: The proposed amendments would apply to all entities, except for the requirements in paragraphs 280-10-50-25 and 280-10-50-32, which apply only to those public entities subject to the guidance in Topic 280. Is it appropriate to exclude entities that are not public business entities from this guidance? Are there other disclosures for which entities other than public business entities should be allowed a modification?

We believe public and private companies should apply a consistent set of standards. Therefore, we do not think it is appropriate to exclude private entities.

Question 6: Paragraph 330-10-50-11 proposes a requirement to disclose a qualitative description of types of costs that an entity capitalizes into inventory. Would this requirement provide useful information to users?

We do not believe the additional disclosure is decision useful for our investors.

Question 9: Should the proposed disclosures be required only for the fiscal year in which the requirements are effective and years after that fiscal year, or should prior periods be restated in the year in which the requirements are effective? Please explain why.

We believe an option for retrospective adoption should be permitted to allow for meaningful comparative periods at the point of adoption. A prospective approach should also be permitted.

Question 10: How much time would be needed to implement the proposed amendments? Should the amount of time needed to implement the proposed amendments by entities other than public business entities be different from the amount of time needed by public business entities? Should early adoption be permitted? Please explain why.

Given our responses above and the timing of other proposed standards, we believe adequate time should be allotted. If required, at a minimum, a twelve month adoption period would be needed to reflect the proposed changes, including the preparation of additional rollforwards. Early adoption should be permitted.

We appreciate your consideration of our comments, please contacts us if you have any further questions regarding our comments on the Proposed Guidance.

Sincerely,

Shawn M. Barker
Vice President and Controller