

November 21, 2014

Technical Director
Director@fasb.org

File Reference No. 2014-260

Proposed Accounting Standards Update: Compensation—Retirement Benefits (Topic 715) *Practical Expedient for the Measurement Date of an Employer's Defined Benefit Obligation and Plan Assets*

The Accounting Principles and Assurance Services Committee (the "Committee") of the California Society of Certified Public Accountants ("CalCPA") respectfully submits its comments on the referenced proposal. The Committee is the senior technical committee of CalCPA. CalCPA has approximately 40,000 members. The Committee consists of 53 members, of whom 47 percent are from local or regional CPA firms, 27 percent are from large multi-office CPA firms, 12 percent are sole practitioners in public practice, 10 percent are in academia and 4 percent are in international CPA firms. Members of the Committee are with CPA firms serving a large number of public and nonpublic business entities, as well as many non-business entities such as not-for-profits, pension plans and governmental organizations.

Question 1: *Should entities with fiscal year-ends that do not fall on a month-end be permitted as a practical expedient to measure their defined benefit plan assets and obligations as of the month-end that is closest to their fiscal year-end? If not, why?*

Yes. The Committee also recommends that the Board extend the practical expedient to interim periods for those entities that present plan information in interim financial statements.

Question 2: *Should the practical expedient be applied consistently to all plans if an employer has more than one plan?*

Yes, the Committee believes the practical expedient should be applied to all plans if an employer has more than one plan.

Question 3: *The amendments in this proposed Update would require an entity to adjust the funded status recognized in its statement of financial position to reflect contributions made between the date used to measure defined benefit plan assets and obligations and the entity's fiscal year-end. Should the funded status be adjusted for other transactions (for example, benefit payments or plan amendments) that could occur between the date used to measure defined benefit plan assets and obligations and an entity's fiscal year-end?*

No, the Committee concurs with the accounting as proposed. It believes that an entity should not reflect any other transactions of the plan in measurement of plan assets and obligations.

Question 4: *Should an employer be required to disclose the accounting policy election and the alternative date used for measuring defined benefit plan assets and obligations?*

Yes, the Committee agrees with the proposed disclosures.

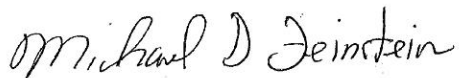
Question 5: *The Board's goal is for the final Update to be adopted as soon as practicable. When should the proposed amendments be effective and should early adoption be permitted?*

The Committee believes the proposed amendment should be effective as soon as practicable. It suggests it be no later than years ending six months after issuance and interim periods within those years. Early implementation should be permitted.

* * * * *

We thank you for the opportunity to comment on this matter. We would be glad to discuss our opinions with you further should you have any questions or require additional information.

Sincerely,



Michael D. Feinstein
Chair
Accounting Principles and Assurance Services Committee
California Society of Certified Public Accountants