



Tel: 312-856-9100
Fax: 312-856-1379
www.bdo.com

330 North Wabash, Suite 3200
Chicago, IL 60611

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Via email to director@fasb.org

Susan M. Cospers
Technical Director
Financial Accounting Standards Board
401 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116

Re: File Reference No. EITF-16B, Employee Benefit Plan Master Trust Reporting

Dear Ms. Cospers:

We are pleased to respond to the Board's proposal to improve the usefulness of the information reported to users of employee benefit plan financial statements.

We support the proposal and believe it will provide more relevant and useful information related to employee benefit plans. Specifically, the proposed presentation of and disclosures related to a plan's interest in a master trust will improve financial reporting for employee benefit plans. We also agree that removing the requirement for a health and welfare plan to include the 401(h) account investment disclosures is appropriate as long as the health and welfare plan is required to disclose the name of the defined benefit pension plan in which those 401(h) account investments are legally held.

As it relates to transition, we believe that implementing the proposed changes will not be overly burdensome for employee benefit plans, and in fact, the plans likely already have access to the necessary information to adopt the proposal retrospectively. Therefore, we would support a retrospective application, with at least a one year transition period from the date a final ASU is issued. We also recommend allowing entities to early adopt.

We would be pleased to discuss our comments with the FASB staff. Please direct questions to Angela Newell at (214) 689-5669 or Darlene Bayardo at (714) 913-2619.

Very truly yours,

BDO USA, LLP