DUTCH ACCOUNTING STANDARDS BOARD (DASB)



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Re : Comment on Exposure Draft Measurement Uncertainty Analysis

Disclosure for Fair Value Measurements

Dear members of the EFRAG Technical Expert Group,

The Dutch Accounting Standards Board (DASB) appreciates the opportunity to respond on your draft comment letter on Exposure Draft Measurement Uncertainty Analysis Disclosure for Fair Value Measurements.

In our 2009 comment letter on the ED Fair value Measurement, we agreed with EFRAG not to support the application of fair value in the ED to all non-financial items. We have not changed our opinion and have repeated it in our current comment letter tot the IASB. Therefore, we believe EFRAG could only agree with the proposals made in the Exposure Draft Measurement Uncertainty Analysis, if applicable for financial instruments only.

We also doubt whether such a minor amendment should be dealt with in an Exposure Draft.

Our answer to the questions to constituents EFRAG raised in its' draft comment letter is that we are not aware of any circumstances as meant in Question 1 and that we have no alternative suggestions to improve the disclosure of the measurement uncertainty analysis.

We hope we have provided you with enough information to understand our view regarding this exposure draft.

Yours sincerely,

Hans de Munnik Chairman Dutch Accounting Standards Board