THE SPARK Institute, Inc.

Submitted Electronically

September 3, 2010

The Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

Attention: Technical Director, File Reference No. EITF100C

Re: **Proposed Accounting Standards Update: Plan Accounting – Defined Contribution Pension Plans (Topic 962)**

Ladies and Gentlemen:

The SPARK Institute, Inc.[1] appreciates this opportunity to comment on the Proposed Accounting Standards Update with respect to Plan Accounting – Defined Contribution Pension Plans (Topic 962), Reporting Loans to Participants by Defined Contribution Pension Plans (the "Update") issued by the Financial Accounting Standards Board (the "FASB") on August 18, 2010. The SPARK Institute members include the industry's leading retirement plan service providers, including record keepers, who will be directly affected by the Update.

The FASB included five questions in the Exposure Draft of the Update for public comment. Our responses to each of the questions, which are based on feedback from our members, are provided below.

[1] The SPARK Institute represents the interests of a broad based cross section of retirement plan service providers and investment managers, including banks, mutual fund companies, insurance companies, third party administrators and benefits consultants. Members include most of the largest firms that provide record keeping services to employer-sponsored retirement plans, ranging from one participant programs to plans that cover tens of thousands of employees. The combined membership services more than 62 million employer-sponsored plan participants.

Question 1: Do you agree that participant loans should be classified by defined contribution pension plans as notes receivable from participants, separately from plan investments? If not, why not? What alternative classification would you prefer and why?

Answer: Yes.

Question 2: Do you agree that participant loans should be measured at their unpaid principal balance plus any accrued but unpaid interest? If not, why not? What alternative measurement would you prefer and why?

Answer: Yes.

Question 3: The Task Force concluded that no additional disclosures specific to participant loans would be required as part of the amendments in this proposed Update. Do you agree? If not, what additional disclosure do you believe would be necessary?

Answer: Yes.

Question 4: Do you agree that the amendments in this proposed Update should be applied retrospectively, with early adoption allowed? If not, why not?

Answer: Yes.

Question 5: How much time do you believe would be necessary for you to efficiently implement the amendments in this proposed Update?

Answer: We expect that minimal time will be needed to implement this change. Our members welcome the simplification provided by the Update.

The SPARK Institute commends the FASB for proposing the Update and encourages it to finalize it as soon as possible.

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The SPARK Institute appreciates the opportunity to provide these comments to the FASB. If you have any questions or need additional information regarding this submission, please feel free to contact us at (704) 987-0533.

Respectfully,

Larry H. Goldbrum
General Counsel