

IASB/FASB Meeting Week commencing 16 May, 2011

IASB Agenda reference

5A

FASB Agenda reference

13B

Project

Staff

Paper

Offsetting Financial Assets and Liabilities

Topic

User Feedback- Addendum to Overall Feedback Summary

Introduction/Purpose of the paper

1. The following tables provide a high level summary of views held by investors and analysts on the proposals in the Exposure Draft (the ED), 'Offsetting Financial Assets and Financial Liabilities'. The staff met with investors and analysts as part of the outreach on the offsetting project. These investors and analysts provided a variety of perspectives. Their views are best read in conjunction with the Feedback Summary (IASB Agenda Paper 5 and FASB Memo 13A) to understand the specific rationale behind the views described in the tables below.

This paper has been prepared by the technical staff of the IFRS Foundation and the FASB for discussion at a public meeting of the FASB or the IASB.

The views expressed in this paper are those of the staff preparing the paper. They do not purport to represent the views of any individual members of the FASB or the IASB.

Comments made in relation to the application of U.S. GAAP or IFRSs do not purport to be acceptable or unacceptable application of U.S. GAAP or IFRSs.

Analysis of User Feedback- Addendum to Overall Feedback Summary

US Constituents

As part of the outreach on the Balance Sheet: Offsetting project with U. S. constituents, the staff met with 61 investors and analysts representing 24 organizations.

Type of Investor	Outreach Participants	Overall View
Buyside investors who specialize in analyzing financial institutions	30	 Roughly one-third were indifferent as long as both gross and net information is provided Roughly one-quarter preferred gross presentation, or net as presented under the proposal Roughly two-fifths preferred net presentation with varying views of the basis of netting (credit, credit and collateral, etc.)
Sellside analysts who specialize in analyzing financial institutions	6	All preferred a net presentation, consistent with current US GAAP
Sellside analysts who specialize in analyzing accounting issues	5	 Almost all preferred gross presentation, or net as presented under the proposal Two respondents (who preferred gross presentation or net under the proposal) suggested that we consider linked presentation
Industry representatives of investors and analysts	2	All preferred gross presentation, or net as presented in the proposals
Credit ratings agency analysts who specialize in analyzing financial institutions	18 analysts representing three credit rating agencies	 One firm was indifferent as long as both gross and net information is provided One firm preferred net presentation but said that comparability was a primary objective that would trump their specific preference One firm preferred net presentation

Non-US constituents

As part of the outreach outside of the US, the staff met with approximately 130 users representing over 50 organisations. The staff also conducted an online survey to request user feedback on the proposals.

Meetings

Type of User	Outreach Participants	Overall View
Asset managers	2	One meeting-primarily net credit
Prudential regulator	25	Mixed responses. • Three meetings (approx. 18 participants) prefer gross • One (five participants) was mixed • One (two participants) had no preference
Securities regulator	13	 One meeting of five participants preferred gross One meeting of eight did not indicate a preference
Analysts -European investment banks	7	 One meeting of five participants preferred net credit One with two participants preferred gross
Other users	54	Mixed responses. One meeting preferred gross (1 organisation) One mixed (44 participants) One meeting net (10 participants) One no preference
User groups	30	• The majority (almost all 30 participants) preferred gross presentation
Total	131	

Survey

We had 36 responses to the user website survey.

Approximately 22 out of 36 respondents use both gross and net information, six only look at gross and eight only look at net. For those who use both, four clarified that they would like the net amounts based on the proposals, four would like the net based on credit with legal enforceability at all times and one based on credit in the event of default /bankruptcy.

Users were also asked, with the proposed criteria in mind, which information they preferred to see on the face of the statement of financial position and which should be disclosed in the notes to the financial statements. Of the 19 who requested net on the face, only two indicated that the proposals were too strict and that they preferred net based on credit only.

See breakout below.

Type of Investor	Survey	Overall View
	Participants	
Both (equity and fixed income)	12	 Eight would like net on balance sheet Two gross on balance sheet Two were indifferent
Equity	19	 Eight would like net on balance sheet Five prefer gross on balance sheet The rest indifferent or no response
Fixed Income	1	Net on balance sheet
Regulator	1	Gross on balance sheet
Not indicated	3	One gross on balance sheetTwo net on balance sheet
Total	36	