

Please note that the comments expressed herein are solely my personal views

Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549-1090
United States
www.sec.gov

Chris Barnard

08 September 2016

- **17 CFR Parts 210, 229, 230, 239, 240, 249 and 274**
- **Release Nos. 33-10110; 34-78310; IC-32175; File No. S7-15-16**
- **Disclosure Update and Simplification**

Dear Sir.

Thank you for giving us the opportunity to comment on your Proposed rule on: Disclosure Update and Simplification.

You are proposing amendments to certain disclosure requirements that may have become redundant, duplicative, overlapping, outdated, or superseded, in light of other SEC disclosure requirements, US Generally Accepted Accounting Principles (US GAAP), International Financial Reporting Standards (IFRS), or changes in the information environment. You are also considering certain SEC disclosure requirements that overlap with, but require information incremental to, US GAAP to determine whether to retain, modify, eliminate, or refer them to the Financial Accounting Standards Board (FASB) for potential incorporation into US GAAP. The proposed amendments are intended to facilitate the disclosure of information to investors, while simplifying compliance efforts, without significantly altering the total mix of information provided to investors.

Insurance companies

For insurance policy liabilities, Rule 7-03(a)(13)(b) of Regulation S-X requires disclosure in the notes to the financial statements of “assumptions (interest rates, mortality, withdrawals) for future policy benefits and claims and settlements which are stated at present value”. US GAAP requires similar disclosure, but does not limit its disclosures to these three stated

Please note that the comments expressed herein are solely my personal views

assumptions.¹ For example, of particular interest to investors and other stakeholders could be disclosure of expense and inflation assumptions, morbidity assumptions, and paid-up and policy conversion assumptions. US GAAP therefore requires broader, more complete and more useful disclosures of relevant assumptions used in estimating the liability for future policy benefits.

Therefore, in answer to your specific question number 28: deletion of the requirement in Rule 7-03(a)(13)(b) for disclosures of the above three assumptions would not affect, in any material respect, the usefulness of information that investors receive.

Yours faithfully

C.R.B.

Chris Barnard

¹ See FASB Accounting Standards Codification 944-40-50.