TXCPA
Texas Society of Certified Public Accountants

July 22, 2026

Technical Director
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RE: File Reference No. 2026-ED100

We appreciate the opportunity to provide feedback on the proposed Accounting Standards Update (ASU), *Compensation-Retirement Benefits-Defined Benefit Plans-Pension (Subtopic 715-30),* dated June 10, 2026. The purpose of the proposed ASU is to clarify the discount rate that should be used to measure the benefit obligation for certain market-return cash balance plans.

The views expressed herein are written on behalf of the Professional Standards Committee (PSC) of the Texas Society of CPAs. The committee has been authorized by the Texas Society of CPAs' Leadership Council to submit comments on matters of interest to the membership. The views expressed in this document have not been approved by the Texas Society of CPAs' Leadership Council or Board of Directors and, therefore, should not be construed as representing the views or policy of the Texas Society of CPAs.

The PSC is supportive of the proposed amendments to clarify the discount rate that should be used to measure the benefit obligation for certain market-return cash balance plans. The PSC also wants to praise the FASB's efforts to ensure standards better reflect the economics of market-return cash balance plans and reduce diversity in practice regarding how the measurement guidance in Subtopic 715-30 should be applied. The PSC does not foresee any implementation issues or auditing challenges arising from the proposed amendments and supports early adoption.

We appreciate the opportunity to submit comments on the proposed ASU, *Compensation-Retirement Benefits-Defined Benefit Plans-Pension (Subtopic 715-30).*

Sincerely,

Jeffrey L Johanns

Jeffrey Johanns, CPA
Chair, Professional Standards Committee
Texas Society of Certified Public Accountants