

26 January 2016

Jenny Carter
Financial Reporting Council
8th Floor
125 London Wall
London
EC2Y 5AS

Sent electronically to: ukfrs@frc.org.uk

Re: Financial Reporting Exposure Draft (“FRED”) 62: Draft amendments to FRS 102

Dear Jenny,

BlackRock Inc. is a premier provider of asset management, risk management, and advisory services to institutional, intermediary, and individual clients worldwide.

As of 31 December 2015, the firm manages £3.18 trillion across asset classes in separate accounts, mutual funds, other pooled investment vehicles, and the industry-leading iShares® exchange-traded funds.

BlackRock is pleased to have the opportunity to respond to FRED 62. We support the Financial Reporting Council’s (“FRC’s”) overriding objective in setting accounting standards to enable users of accounts to receive high-quality understandable financial statements proportionate to the size and complexity of the entity and users’ information needs. We also support the FRC’s efforts to simplify the preparation of disclosures about financial instruments and increase consistency with EU-adopted International Financial Reporting Standards (“IFRS”). It is our view that the proposed amendment will achieve these objectives.

We have set out our comments to your questions below.

Yours sincerely,

Tom McGrath
Director

Emmet Holland
Associate

Question 1

Do you agree with the amendments proposed to FRS 102? If not, why not?

We agree with the proposed amendments to FRS 102.

Question 2

Do you agree with the proposed effective date for these amendments? If not, what alternative would you propose?

We agree with the proposed effective dates for these amendments.

Question 3

In relation to the Consultation Stage Impact Assessment do you have any comments on the costs and benefits identified? Please provide evidence to support your views of the quantifiable costs or benefits of these proposals.

We agree with the costs and benefits identified in the Consultation Stage Impact Assessment. The amendments will result in a fair value hierarchy that is consistent with EU-adopted IFRS and we believe there will be lower costs incurred by preparers of financial statements in relation to resourcing and system updates.