

**The Accounting Standards Committee of ICAAT (Thailand)****Purpose Amendments to IAS 19 Employee Benefits (April 2004-Comments to be received by 31 July 2004)****1. Initial recognition of actuarial gains and losses**

-We agree with this additional option if the statement of recognized income and expense is an alternative statement for presenting firm performance.

If the deferred actuarial gains and losses is elected, the impact should be presented in the statement of changes in shareholders' equity (like the presentation of changes in valuation of investments classified as Available for Sales).

**2. Initial recognition of the effect of the limit on the amount of a surplus that can be recognized as an asset**

- We suggest that recognition be the same as No. 1.

**3. Subsequent recognition**

- We agree that if they are opted to be recognized and presented in the statement of recognized income and expense, they should not be recognized in the P/L again.

**4. Recognition within R/E**

If actuarial gains and losses are recognized outside P/L, they should be presented as a separate component of equity and transferred to R/E in a later period when they actually occur.

Normally if they are recognized through P/L, they will affect directly to R/E. But if we are bypassing P/L, we may not be able to track the transactions properly.

**5. Defined benefit plans for a group**

a) & b) Provision in IAS 19

- Since the criteria defined is reasonable, we support the proposal.

**6. Disclosures**

- We corroborate all additional disclosures in a). However, we suggest setting this requirement into the convergent project with FASB

**7. Further disclosures**

- We agree with the proposal.

(a) and (b) Provide more information which is similar to the contingent liabilities or commitment of the entity.

(c) if the change has significant effect to the F/S.