



Jenny Carter
Financial Reporting Council
8th Floor
125 London Wall
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22 March 2016

Dear Ms. Carter,

Via email: ukfrs@frc.org.uk

FRED 63 Draft amendments to FRS 101 Reduced Disclosure Framework – 2015/16 cycle

BT welcomes the opportunity to comment on the FRC's Exposure Draft in relation to the disclosure requirements of IFRS 15.

We have adopted FRS 101 for the year ending 31 March 2016 for our UK and Ireland based subsidiaries and are supportive of the FRED 63 proposals.

Our responses to the specific questions raised in the ED are as follows:

Question 1

We agree that FRS 101-qualifying entities have limited external users of the financial statements and that these external users may often be providers of credit with a greater focus on information that supports the balance sheet (ie liquidity and solvency) rather than detailed analysis of performance as required by some of the disclosures in IFRS 15. Hence removal of these requirements supports the principles that the Accounting Council has set out of relevance, cost considerations and avoiding gold plating.

Question 2

We agree with the Accounting Council's advice to the FRC that principles of relevance, balancing the benefits to users with the cost of financial reporting and the avoidance of gold plating should be applied when determining which of the disclosure requirements in EU-adopted IFRS should be applied by qualifying entities. We do not consider that additional refinements are necessary.


Question 3

We agree with the proposed amendments to FRS 101.

Question 4

We have no further comments on the costs and benefits identified. We agree that the proposals will have a positive impact on financial reporting and should reduce the costs of compliance with IFRS15 for entities applying FRS101.

Yours sincerely,


GLYN PARRY
Director, Group Financial Control
BT Group PLC