



LETTER OF COMMENT NO. 52

REGIONS

January 15, 2009

Mr. Russell G. Golden
Technical Director
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

File Reference: Proposed FSP FAS 107-a, *Disclosures about Fair Value of Financial Instruments*

Dear Mr. Golden:

We appreciate the opportunity to comment on this Exposure Draft. Regions Financial Corporation (“Regions” or “the Company”), with approximately \$144 billion in assets, is one of the nation’s largest full-service providers of consumer and commercial banking, trust, securities brokerage, mortgage and insurance product services. Regions serves customers in 16 states across the South, Midwest and Texas, and through its subsidiary, Regions Bank, operates 1,900 banking offices and a 2,400-ATM network. We provide brokerage services and investment banking through approximately 400 offices of Morgan Keegan & Company, Inc.

We agree with the Board’s assertion that the existing accounting standards for financial assets result in differing measurement and impairment models for economically similar assets. However, we believe that the most appropriate solution to this problem is for the Board to address this issue in its joint project with the IASB related to recognition and measurement of financial instruments, including impairment. Introducing new disclosure requirements that contain new measurement principles that are not required in existing accounting standards (e.g., the “incurred loss model” for held-to-maturity and available-for-sale debt securities) only adds to the current complexity in financial reporting.

Additionally, the new disclosures required under this proposed FSP are effective for Regions for its December 31, 2008 annual report. Based on the comment period, it is likely that a final FSP will not be issued until the end of January. With a filing deadline of March 2, 2009, that leaves only approximately four weeks for Regions to implement the FSP. This is inadequate time to appropriately prepare and review these new disclosures, and have appropriate controls in place (under our Sarbanes-Oxley Section

404 process). This proposal introduces new measurement attributes that we do not currently track from an operational perspective. In particular, compiling cash flow information for our securities portfolio will be time-consuming, especially during a period when the appropriate personnel resources are focused on the broader reporting issues made more complex for 2008 by the economic downturn. If the Board decides that these new disclosures are relevant to users of financial statements, then Regions would request that this proposed FSP would not be effective until annual reporting periods beginning after December 15, 2009, to allow financial statement preparers adequate time to comply.

Again, we appreciate the opportunity to comment on this exposure draft and we thank you for considering our views. If you have any questions about our comments or wish to discuss this matter further, please contact me at (205) 326-4972.

Sincerely,



Brad Kimbrough
Executive Vice President, Controller and
Chief Accounting Officer