

January 15, 2007



LETTER OF COMMENT NO. *6A*

Technical Director  
Financial Accounting Standards Board  
401 Merritt 7  
P.O. Box 5116  
Norwalk, CT 06856

Proposed FASB Staff Position FAS 158-a "Conforming Amendments to the Illustrations in FASB Statements No. 87, No. 88, and No. 106 and to the Related Staff Implementation Guides"

This is an addendum to our original letter. Our additional comments are:

1. E15 page 134. This Q and A refers to Statement 141 in the Q portion. The references to paragraphs in the answer portion are to Statement 87 but are not labeled. It would increase clarity to add "of this Statement" or similar language.
2. E55 page 154. This Q and A refers to paragraph 44 of FASB 87 but does not reference the new material added by Statement 158 in paragraph 44A. We suggest that this Q and A be reviewed to determine whether the new guidance should be incorporated. The same comment applies to E57, E58 and E61. E61 on pages 156 and 157 makes reference to paragraphs 186-188 of Statement 106 in the Basis for Conclusions. Those are the paragraphs that have been elevated and renumbered by Statement 158 and the reference should be changed.
3. Illustration 8, page 156. The distribution of the amounts previously recognized in other comprehensive income has been accounted for as an adjustment of the balances of accumulated other comprehensive income in the journal entries. There is no mention of this accounting in the text. For clarity it may be useful to mention that in the text. Also, the tax effects have not been included. The same comment applies to Illustration 4 on page 201.
4. Illustration 1, Page 185 does not include tax effects. The same comment applies to the entries on pages 194 and 196.
5. C32 page 187. The description of how the settlement gain or loss would be accounted for does not include recognition in both other comprehensive income and earnings instead of as an offset to the recognized gain alone.

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Addendum



6. C39 page 189. A curtailment or settlement gain or loss may be recognized in earnings or simultaneously in earnings and other comprehensive income. The effect on other comprehensive income is not discussed.
7. Illustration 3, page 192. For clarity, it would be better to list separately the amounts recognized in earnings and recognized in other comprehensive income, including tax effects.
8. C40, page 198. The description of the nonmonetary transaction does not include the tax effects.
9. C47 page 206. The prior service cost would be recognized both in earnings and other comprehensive income. The guidance only refers to recognition in earnings.

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We would be pleased to discuss our comments and recommendations with Board members or the staff. Please direct your questions or comments to John Hepp at (312) 602-8050 or Lynne Triplett at (312) 602-8060.

Sincerely,

/s/ Grant Thornton LLP