



Medtronic

Keyna P. Skeffington

Vice President

Deputy General Counsel & Assistant Secretary

1840-100
Comment Letter No. 16

Medtronic, Inc.

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via email: director@fasb.org

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

File Reference: No. 1840-100 *Disclosure of Certain Loss Contingencies*

Dear Mr. Golden:

I am writing on behalf of Medtronic, Inc., which is currently considering the July 20, 2010 Proposed Accounting Standards Update of Topic 450 (the "Proposed Statement"). We believe that the thirty day comment period is too short to allow for a careful consideration of both the legal and accounting implications of the Proposed Statement. In particular, we would like time to fully consider any issues raised by the American Bar Association (ABA) in its coordination with FASB regarding potential implications of the Proposed Statement on the ABA's Statement of Policy Regarding Lawyers' Responses to Auditors' Requests for Information. We therefore respectfully request an extension of the comment period for at least an additional thirty days, so that we and others wishing to comment have sufficient time to fully consider the Proposed Statement and submit additional comments.

Please feel free to contact me at 763-505-2758 or via email at keyna.skeffington@medtronic.com if you have any questions.

Respectfully submitted,

Keyna P. Skeffington

Vice President

Deputy General Counsel and Assistant Secretary

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