September 9, 2010

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

File Reference No. 1840-100

Via email: director@fasb.org

Re: FASB's Proposed Accounting Standards Update—*Contingencies (Topic 450): Disclosure of Certain Loss Contingencies ("the* proposal*")*

Dear Ladies and Gentlemen:

On behalf of salesforce.com, inc. (the "Company"), we appreciate the opportunity to share our views on the above referenced proposal. We have focused our views on loss contingencies related to litigation and similar matters involving disputes between parties. We believe those are the contingencies that raise the most concern in terms of whether disclosures have historically been sufficient and in terms of whether the proposed expanded disclosures are possible or advisable.

Salesforce.com, inc. is a leading provider of enterprise cloud computing applications. The Company was incorporated in February 1999 and provides a comprehensive hosted customer and collaboration relationship management service to businesses of all sizes and industries worldwide, and provides a technology platform for customers and developers to build and run business applications.

The Company's stock is publicly traded on the New York Stock Exchange and the Company's stock is included in the Standard & Poor 500 Index. Our revenue last year was in excess of $1.3 billion.

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In general, the Company supports the objectives underlying the proposal.

The Company believes, however, that more consideration is needed in the final standard to address situations where the preparer is involved in a single significant claim or assertion.

We believe that the standard as proposed could create the unintended consequence of the preparer disclosing prejudicial information related to the possible loss contingency.

The proposed standard leverages extensively publicly available information and provides companies with the ability to aggregate similar type claims. We believe this decision by the FASB reduces the chances of prejudicial information being disclosed.

But the proposed standard does not provide sufficient guidance for preparers in situations where they are dealing with only one significant loss contingency. Accordingly, the preparer cannot avail itself of the aggregation alternative described in the proposed standard.

As part of the proposed disclosure requirements, the preparer in this situation would be required to disclose the amount of accrual recorded (proposed ASC 450-20-50-1F(a)) and disclose a rollforward of any accrued liability (proposed ASC 450-20-50-1F(g)). This would result in a disclosure of the preparer's estimate of the probable loss, information which would not otherwise be available to the counterparty in such a claim. Particularly when discussion of the claim is private and privileged and litigation has not yet been filed, this information could very easily be prejudicial to the preparer's position in the case, and thus could have a negative impact on the outcome of the settlement negotiations.

The FASB asserts in BC35 that current US GAAP (ASC 450-20-50-1) already requires disclosure of loss contingencies. We do not believe that this guidance is commonly accepted to require disclosure of the amount accrued for all material loss contingencies, as would be required by the proposal.

Based on the above, we believe that the board should reconsider how it can best accomplish the goal of not requiring the disclosure of prejudicial information.

As a separate matter, the proposed standard creates a distinction in disclosure requirements for public and nonpublic companies, whereby nonpublic companies are not required to provide a rollforward of the accrued loss contingencies.

While we have concerns about the rollforward requirement in the situations described above, we believe that there is no basis to exempt private companies from such a requirement if it is considered to allow financial statement users to better understand the potential effects of loss contingencies.

While the board suggests that users of nonpublic companies' financial statements typically have access to more information than users of public company financial statements, we observe that this is only true for certain users of financial statements of nonpublic companies, such as lenders and major investors. Other users, such as employees and suppliers or potential suppliers, would not have such access. Therefore, we believe nonpublic companies should be held to the same disclosure standard.

We appreciate the Boards' consideration of this matter and welcome the opportunity to discuss any and all related matters. I can be contacted at (415) 901–7000.

Sincerely,

/s/ Joseph C. Allanson

Joseph C. Allanson
SVP, Controller
salesforce.com, inc.