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December 22, 2010

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

File Reference No. 1900-200

Re: Proposed Accounting Standards Update, Deferral of the Effective Date of Disclosures About Troubled Debt Restructurings in Update No. 2010-20

Dear Technical Director:

Deloitte & Touche LLP is pleased to comment on the FASB's proposed Accounting Standards Update (ASU) *Deferral of the Effective Date of Disclosures About Troubled Debt Restructurings in Update No. 2010-20*. We support the issuance of the proposal as a final ASU. The proposed ASU avoids the potential additional costs that an entity might incur to change its systems and processes multiple times during a relatively short period without significantly delaying the benefits of the additional disclosures about TDRs.

Our only recommendation is that the Board also indefinitely defer the effective date of the TDR-related disclosures of ASU 2010-20 for nonpublic entities. Expanding the deferral to include nonpublic entities would avoid the need to propose and finalize another ASU in the event that the proposed TDR clarification guidance is not completed as currently expected.

We appreciate the opportunity to comment on the proposed ASU. If you have any questions concerning our comments, please contact Adrian Mills at 203-761-3208.

Yours truly,

Deloitte & Touche LLP

cc: Bob Uhl

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¹ FASB Accounting Standards Update No. 2010-20, *Disclosures About the Credit Quality of Financing Receivables and the Allowance for Credit Losses*.