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September 30, 2011

Ms. Susan M. Cospers
Technical Director
Financial Accounting Standards Board
401 Merritt 7, PO Box 5116
Norwalk, CT 06856-5116

Sent via e-mail to: director@fasb.org

Re: Exposure Draft: *Derecognition of in Substance Real Estate— a Scope Clarification
a consensus of the FASB Emerging Issues Task Force* (File Reference No. EITF-100E)

Dear Ms. Cospers:

McGladrey & Pullen is pleased to submit our comments on the above-referenced exposure draft. We agree with the proposals in the exposure draft, including the issues put forth in Questions for Respondents 1-4.

With respect to Questions 5 and 6, we would not object to entities being allowed to early adopt the amendments, and we do not believe that the provisions would require an extensive period of time to adopt.

We note that some question exists as to whether the guidance will be used by analogy by lenders in these situations. The Board or the EITF might wish to address that issue.

We would be pleased to respond to any questions you may have concerning our comments. Please direct any questions to Rick Day (563-888-4017) or Richard Stuart (203-905-5027).

Sincerely,

A handwritten signature in cursive script that reads 'McGladrey & Pullen, LLP'.

McGladrey & Pullen, LLP