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Technical Director
Financial Accounting Standards Board
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Credit Suisse Group ("CSG") welcomes the opportunity to comment on the Financial Accounting Standards Board's ("FASB") proposed Accounting Standards Update *Presentation of Financial Statements (Topic 205): Reporting Discontinued Operations.*CSG is registered as a foreign private issuer with the Securities and Exchange Commission and its consolidated financial statements are prepared in accordance with accounting principles generally accepted in the United States ("US GAAP"). However, a number of our subsidiaries are required to apply International Financial Reporting Standards ("IFRS") to their stand-alone financial statements.

Overall, CSG supports the proposed ASU and we agree with the definition of a component of an entity and when that component would be considered a discontinued operation. We also fully support the FASB's efforts to converge US GAAP with IFRS.

Although we believe that this update will result in more convergence with IFRS, we feel that the FASB has created a more onerous burden for US GAAP filers by expanding the scope of disclosures beyond that currently required by IFRS 5. As such, this does not achieve the Board's stated objective of reducing the cost and complexity for preparers. We believe a better balance should be found between quality and volume of information.

We agree with the prospective application transition method as retrospective transition would not add meaningful disclosures but would require additional effort and are supportive of early adoption.

We would welcome the opportunity to further review any changes you may consider to this proposed standard prior to its final issuance. In the meantime, if you have any questions or would like any additional information on the comments we have provided herein, please do not hesitate to contact Todd Runyan on +41 44 334 80 63.



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Sincerely,

Rudolf Bless

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