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Eli Lilly and Company
Lilly Corporate Center
Indianapolis, Indiana 46285
U.S.A. 1840-100
Comment Letter No. 10

Date: August 10, 2010

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

Via email: director@fasb.org

Re: File Reference No. 1840-100: Proposed Accounting Standards Update, "*Disclosures of Certain Loss Contingencies*"

Dear Mr. Golden:

Eli Lilly and Company appreciates the opportunity to comment on the Financial Accounting Standards Board's (FASB's) Proposed Accounting Standards Update, "Disclosures of Certain Loss Contingencies" (the "Proposed ASU"). Eli Lilly is a large, multinational company that creates and delivers innovative medicines that enable people to live longer, healthier, more active lives. While we support the FASB's efforts to provide meaningful financial reporting to readers of the financial statements, which will be impacted by the Proposed ASU, and the attempt to spread out the release of exposure drafts over the next 18 months, we are extremely concerned with the 30-day comment period for the Proposed ASU.

The Proposed ASU will potentially have a significant impact to our financial statement disclosures, and we want to provide you meaningful and robust comments for your consideration. However, we are concerned that the extremely short comment period will not provide those affected enough time to adequately understand the Proposed ASU, consult with legal advisors, assess the implications to the financial statements, and prepare thoughtful comments. Given the complexities of the Proposed ASU and significant implications to preparers of financial statements, we believe it is extremely important to fully assess the impact of the Proposed ASU. In addition, we are in the process of concurrently evaluating the proposed Revenue Recognition Standard with limited resources. Thus, we strongly encourage you to extend the comment period at least another 30 to 45 days to provide stakeholders the time to appropriately understand, consult, assess, and comment on the Proposed ASU.

Thank you for your consideration.

Sincerely,

S/Arnold C. Hanish
Vice President, Finance
and Chief Accounting Officer