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August 16, 2010

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

File Reference: 1840-100

Re: Proposed Accounting Standards Update, Contingencies (Topic 450) — Disclosure of Certain Loss Contingencies

Dear Mr. Golden:

Deloitte & Touche LLP appreciates the opportunity to comment on the FASB's proposed Accounting Standards Update (ASU), *Disclosure of Certain Loss Contingencies*. We will provide our comments on the proposed ASU in a comment letter to follow. The purpose of this letter is to request that the Board extend the comment period on the proposed ASU.

We believe the proposed disclosures represent a significant change from both existing practice and the FASB's June 2008 proposed Statement, *Disclosure of Certain Loss Contingencies*. We strongly encourage the Board to vote at its August 18, 2010, meeting to extend the comment period for at least 30 days to give constituents the opportunity to thoroughly consider the proposed disclosures and respond with meaningful insights.

Thank you for your consideration.

Yours truly,

Deloitte & Touche LLP

cc Robert Uhl