



August 17, 2010

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

File Reference 1840-100: Exposure Draft – Proposed Accounting Standards Update,
“Disclosure of Certain Loss Contingencies”

We understand that the Board will consider requests for additional time to submit comment letters. ***Regions asks for another 60 days for additional analysis.*** The Exposure Draft was issued on July 20, seven days before our second quarter earnings release, and 20 days before the required filing date for our second quarter Form 10-Q. We also point out that many public companies were impacted by XBRL transition during this timeframe (Tier 1 filers with calendar fiscal years were required to tag footnotes, and Tier 2 filers were required to tag financial statements). Additionally, in our own industry, the impact of financial regulatory reform from the Dodd-Frank Wall Street Reform and Consumer Protection Act has consumed the time of many professionals who would otherwise have been focused on the exposure draft (note that Dodd-Frank became law the day after the exposure draft was issued). Accordingly, many preparers and other interested parties, notably those within the legal profession, have not had the capacity to read the proposed standard, draft pro forma disclosures, and thoroughly evaluate the potential impact. As in other recent cases, we are concerned that the speed of rulemaking is prohibiting appropriate due process.

If you have any questions about our comments or wish to discuss this matter further, please contact me at (205) 326-4972.

Sincerely,

A handwritten signature in black ink that reads "Brad Kimbrough".

Brad Kimbrough
Executive Vice President, Controller and
Chief Accounting Officer