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Technical Director  
File Reference No. 1840-100  
Financial Accounting Standards Board  
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PricewaterhouseCoopers LLP appreciates the opportunity to provide comments on the FASB's Proposed Accounting Standards Update, Contingencies (Topic 450): *Disclosure of Certain Loss Contingencies* (the "proposal"). We appreciate the Board's efforts to address certain of the concerns raised by constituents in response to the original Exposure Draft (ED) on this project and believe the current proposal is an improvement over the original ED. However, for the reasons described in this letter, we are not supportive of the Board continuing its near-term work on this project.

We understand that the Board believes that contingency disclosures should not affect the outcome of the contingency, and we acknowledge the Board's revisions from the original ED that attempt to mitigate the prejudicial concerns raised by constituents. However, we continue to understand from our outreach to preparers and the legal community that not all concerns have been successfully addressed. Therefore, we continue to have serious reservations about certain of the proposed disclosures, which we believe will have a negative effect on a company's litigation posture.

We agree the objective of financial reporting should be to provide financial statement users with transparent, comprehensive and decision-useful information. Given the constraints of the U.S. legal system, we believe that in the case of loss contingencies the objective must be balanced against the prejudicial impacts that can unfairly and adversely affect a company and its investors. For this reason, we believe it is important that the Board resolve the prejudicial concerns prior to the issuance of a final standard.

Once the prejudicial concerns are resolved, however, we anticipate that a final standard would provide incremental, but only marginal, improvement over the loss contingency disclosure requirements that exist today. Accordingly, we believe this project is of lower priority relative to other projects on the Board's agenda. Current convergence projects should be prioritized based on existing divergence and the need for improvements in the standards that will be replaced to maximize the benefit to financial statement users. The Board has undertaken and agreed upon a very aggressive agenda relative to its Memorandum of Understanding projects with the IASB. Constituents are currently attempting to digest and respond to major proposed standards, and additional standards are expected to be proposed throughout the remainder of 2010. In light of this environment, we believe that the already stretched resources of constituents and the FASB should be focused on the convergence projects of highest priority to users, rather than a project that we believe will result in only marginal improvement over current practice.

If the Board chooses to move forward with the issuance of a final standard, we recommend addressing the following key matters.

*The Impact of the U.S. Legal Environment*

Consistent with the perspectives offered in our 2008 comment letter, we believe that in making the case for change, the Board and its constituents need to be confident that the Board's goal of better informing financial statement users is balanced against the challenges of developing and presenting that information in today's U.S. legal environment. The current proposal again highlights the natural tension between greater transparency and the potential consequences that may come with it.

We acknowledge that the proposal will provide users with considerably more information about loss contingencies than they currently receive. However, both the legal and preparer communities continue to express concerns that certain of the proposed disclosures could expose a company's legal strategy and provide plaintiffs with information that could compromise the company in litigation or in settlement negotiations. Such a result could be significantly detrimental to investors.

Among the disclosures that could be perceived as prejudicial to a company's legal strategy are the amounts accrued for a contingency and the tabular reconciliation of accrued amounts, including a description of the significant activities reported in the reconciliation. Disclosure of the accrued amount could establish a floor for plaintiffs in settlement negotiations. Disclosure of the accrued amount, and changes in the accrued amount during a reporting period, could also be linked to specific developments in the case, providing further insight into management's thinking. This could be true, despite the aggregation principle, as more fully described in our response to Question 6. We believe that an alternative to these requirements is the existing requirement to disclose the accrued amount if not doing so would make the financial statements misleading.

Similarly, disclosing information related to "discoverable" insurance or indemnification agreements, especially when this information has not yet been discovered by, or provided to, a plaintiff may be prejudicial. The potential recovery information could essentially establish a floor for plaintiffs in settlement negotiations, or may encourage additional "copy-cat" claims to be filed against the company. We recommend that the proposed requirement to disclose information related to insurance or indemnification agreements when it is "discoverable" be eliminated. In addition, many have also expressed concerns over requiring a company to prematurely disclose the basis for its defense, if it has been determined, as this too could provide a plaintiff with prejudicial insights into a company's legal strategy. We recommend that this requirement also be eliminated.

If the Board nevertheless decides to include these requirements (or others that could be considered prejudicial) in the final standard, we recommend that an exemption from disclosing prejudicial information, and a requirement to describe the reasons why the exemption was used, be included in the standard. However, similar to the items described below, the inclusion of a prejudicial exemption would likely require a need for greater communication between a company's legal counsel and the company's auditor.

*Operating under the "Treaty"<sup>1</sup> and Current Practice*

The carefully-constructed balance that exists among legal considerations, investor and other financial statement user needs, and the need for audit evidence must be maintained. That balance could be strained by the nature and subjectivity of certain of the proposed disclosures

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<sup>1</sup> The "Treaty" is comprised of two documents: the ABA Statement of Policy Regarding Lawyer's Responses to Auditors' Requests for Information, and the AICPA Statement of Auditing Standards No. 12.

that will create a challenge for auditors to understand management's assessments and to obtain sufficient evidence to support them. For example, corroborating management's assertions about which remote contingencies meet the disclosure threshold, whether insurance arrangements are "discoverable" in a legal proceeding, information that management asserts is "privileged," and the use of a prejudicial exemption (if such an exemption were included in the final standard) may be challenging. Assessing such assertions requires a certain level of expertise in legal matters that the auditor relies on a company's legal counsel to provide. This increases the importance of detailed communications between a company's legal counsel and the company's auditor. Legal counsel's written response to a letter of audit inquiry often serves as the primary means to corroborate management's assertions related to loss contingencies that arise from litigation. However, the level of detail provided in these letters varies considerably, and in many cases such responses as currently framed would not be sufficient to provide corroboration of all of the disclosures required in the current proposal. Further, management may hesitate to provide additional audit evidence to supplement the response from legal counsel based on concerns that the information constitutes legal advice the company has received. We have been informed that providing such information could expose a company to claims that the attorney-client privilege, attorney work-product doctrine, and other legal protections have been waived. We understand that if disclosure is made and information is provided to the auditors, that information might be held to be subject to discovery by the plaintiff. On the other hand, by withholding such information, the ability of the company's auditors to obtain sufficient audit evidence supporting the disclosure would be impaired.

We acknowledge the FASB's intent to work with the PCAOB, AICPA, and ABA to identify and address any potential operational issues of a new standard under the existing Treaty and current practice as it relates to the content of audit-response letters provided by attorneys. We believe the Board must resolve these potential issues prior to the issuance of a final standard.

#### *Disclosure of Remote Contingencies*

We question whether the disclosure of any remote item is "decision-useful" to the users of an entity's financial statements. Disclosure of remote items could give credence to matters that, in management's best judgment, have only a slight chance of eventually resulting in a loss to the company. The disclosures will likely be onerous for a company to provide, and would increase the overall volume of disclosures for loss contingencies, requiring investors and other users of financial statements to spend more time discerning which matters have the highest likelihood of actually resulting in a loss to the company. We believe that an adequate threshold for disclosure is provided for in the accounting standard on risks and uncertainties<sup>2</sup>, which does not require disclosures of remote loss contingencies. If the requirement to disclose certain remote contingencies remains in the final standard, we believe that the Board must better articulate the principle under which a remote claim would meet the threshold for disclosure to assist preparers in making this assessment.

#### *Effective Date*

If a final standard is issued, there may be significant costs associated with modifying an entity's reporting systems, processes, and internal controls to be capable of complying with the standard. Systems and reporting packages may need to be expanded to capture more data, as more detailed information and assessments of contingencies will be required. For example, existing systems may not be designed to capture detailed activity in accrual balances by class from all of a company's consolidated reporting entities. Entities will also likely require more frequent and more detailed

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<sup>2</sup> The U.S. GAAP standard on risks and uncertainties is ASC Topic 275, *Risks and Uncertainties*.

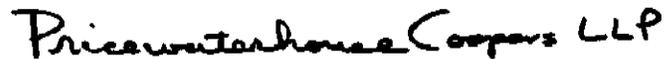
communications with outside counsel to assist them in the reporting process, such as determining whether an asserted remote contingency meets the threshold for disclosure. Given the changes that may be necessary, we believe that it would be impracticable for companies to change the controls and processes necessary to meet the disclosure requirements and to make the related, required assertions over the design and operating effectiveness of their internal controls over financial reporting, in their 2010 annual financial statements. Accordingly, if a final standard is issued in 2010, it should be effective for annual financial statements for years ending after December 15, 2011 for all entities. Additionally, if further communications among the FASB, PCAOB, AICPA, and the ABA with respect to the Treaty are necessary, the issuance of a final standard could be delayed and the effective date should be modified accordingly.

\* \* \*

In conclusion, we are not supportive of the Board's near-term continuation of this project due to the concerns expressed in this letter. However, if the Board decides to issue a final standard, please consider our comments in this letter and in our responses to the specific questions contained in the proposal, included in Appendix A. Additionally, we recommend certain clarifications and editorial changes in Appendix B.

If you have any questions regarding our comments, please contact Michael J. Gallagher at (973) 236-4328, Paul R. Kepple at (973) 236-5293, or John R. Formica, Jr. at (973) 236-4152.

Sincerely,

A handwritten signature in black ink that reads "PricewaterhouseCoopers LLP". The signature is written in a cursive, slightly slanted style.

*PricewaterhouseCoopers LLP*

Appendix A - Responses to Specific Questions

Appendix B - Clarifications and Editorial Changes

## Appendix A - Responses to Specific Questions:

### FASB Proposed Accounting Standards Update, Contingencies (Topic 450): *Disclosure of Certain Loss Contingencies*

#### 1. Are the proposed disclosures operational? If not, please explain why.

Certain aspects of the proposal are not operational because they would be prejudicial. We have described this concern in greater detail in our cover letter and in our response to Question 3. In addition, there are operational concerns about the ability to audit certain of the proposed disclosures as described in our cover letter. We also believe that a 2010 effective date is not practicable, as described in greater detail in our cover letter and in our response to Question 4. Other, specific operational issues are discussed in the following paragraphs.

The proposal states that possible recoveries from insurance or indemnification arrangements should not be considered when assessing the materiality of loss contingencies to determine whether disclosure is required. Based on this guidance, and the conforming amendment to ASC Topic 210 included in the proposal, we believe that it is the Board's intent that gross liabilities be disclosed separately from any related insurance or indemnification arrangements. This guidance could, however, be interpreted to require that companies that are jointly and severally liable consider the aggregate liability in determining whether the contingency meets the disclosure threshold. We believe that interpretation is not consistent with the Board's intent. For example, we expect a company that is one of multiple potentially responsible parties (PRPs) in an environmental remediation matter to only assess its allocable share of the liability (including non-participating PRPs) in determining whether the contingency meets the disclosure threshold. We would suggest that the proposal be revised to make this clear.

Additional guidance on sources of evidence for unasserted claims and assessments was provided in the proposal. However, certain of the terms used, such as "studies," "reputable," and "credible" are not well defined and may cause operational challenges for preparers as they attempt to interpret this guidance. Also, the knowledge of which sources "other entities in the same industry generally review" may be outside of the expected knowledge of a preparer. We recommend that this guidance be clarified to be more easily understood and applied.

In general, we believe that providing the enhanced disclosures will be more costly for companies since it will require developing new processes and internal controls, and additional resources to assess contingencies and draft the necessary disclosures. Companies may also incur additional external legal costs in obtaining, compiling, and verifying evidence that supports the enhanced disclosures. In addition, companies would likely incur more audit costs as auditors institute additional procedures and engage in greater interaction with management and the company's legal counsel to corroborate management's assertions with respect to the expanded disclosures and to assess the completeness of those disclosures.

#### 2. Are the proposed disclosures auditable? If not, please explain why.

Please see comments in our cover letter and in our response to Question 1 above.

#### 3. The June 2008 FASB Exposure Draft, *Disclosure of Certain Loss Contingencies*, had proposed certain disclosures based on management's predictions about a contingency's resolution. The amendments in this proposed Update would eliminate those disclosure requirements such as estimating when a loss contingency would be resolved and the entity's maximum exposure to loss. Do you agree that an explicit

**exemption from disclosing information that is “prejudicial” to the reporting entity is not necessary because the amendments in this proposed Update would:**

- a. Not require any new disclosures based on management’s predictions about a contingency’s resolution**
- b. Generally focus on information that is publicly available**
- c. Relate to amounts already accrued in the financial statements**
- d. Permit information to be presented on an aggregated basis with other similar loss contingencies?**

**If not, please explain why.**

Despite the Board's intentions and the factors referenced in this question, we understand that both the legal and preparer communities believe that certain of the proposed quantitative and qualitative disclosure requirements could hinder a company's ability to defend itself in litigation. Such a result could be significantly detrimental to investors. We understand that the Board believes that disclosures should not impact the outcome of a contingency. We encourage the Board to reconsider whether certain of the proposed disclosures would be inconsistent with that notion.

For example, the legal profession has indicated that many companies may not have more than one pending claim or lawsuit of significance at a given time, as may be expected in a class-action litigation environment. Additionally, companies may have several claims of a similar type, with one of the claims being much larger in magnitude than the others. In either instance, providing the required disclosures, even in the situation where aggregation by similar type is possible, may enable plaintiffs to discern the case to which the disclosures relate. Ultimately, a company's disclosures could, in many instances, be sufficiently revealing that they would render moot the protection that aggregation is intended to provide.

We understand that many in the legal and preparer communities believe that disclosure of any amounts accrued for a contingency is prejudicial, as this is not publicly-available information, and establishes a floor for the plaintiff in a settlement negotiation. Regarding the tabular reconciliation, we understand that disclosure of changes in recorded amounts, along with disclosure of the reasons for such changes, could be prejudicial, since, for example, those disclosures might reveal the company's thinking and strategy on a major piece of litigation. We also understand that courts often consider information related to changes in accrued amounts so prejudicial that they decline to admit it as evidence.

Similarly, disclosing information related to "discoverable" insurance or indemnification agreements, especially when this information has not yet been discovered by, or provided to, a plaintiff may be prejudicial and also may establish a floor for the plaintiff in a settlement negotiation. We have also been informed that disclosure of this information may encourage additional claims to be asserted against a company if potential plaintiffs are made aware of a company's insurance coverage. In addition, many have also expressed concerns over prematurely disclosing a company's basis for its defense strategy, if it has been determined, as this too could provide a plaintiff with prejudicial insights into a company's legal strategy. Further, disclosure in the financial statements of the claim amount may encourage claims to be inflated to pressure a company to enter into settlement negotiations to avoid disclosure of the amount.

As described in our cover letter to these responses, we recommend further changes to the proposal to address these concerns. However, if these requirements remain in the proposal, we recommend that an exemption from disclosing prejudicial information, and a requirement to describe the reasons why the exemption was used, be included in the standard.

**4. Is the proposed effective date operational? If not, please explain why.**

As indicated in our cover letter, if a final standard is issued in 2010, the effective date should be for annual financial statements for years ending after December 15, 2011 for all entities. If the Board nevertheless decides to move forward with the proposed effective date, we would recommend, at a minimum, providing a deferral for one reporting period of the requirement to present the tabular reconciliation of recognized contingencies, as gathering and preparing that information for all of 2010 (on a retroactive basis) may be challenging given the timing of when a final standard would likely be issued.

**5. Do you believe that the proposed disclosures will enhance and improve the information provided to financial statement users about the nature, potential magnitude, and potential timing (if known) of loss contingencies?**

We acknowledge that the proposed disclosures will provide more information to users of financial statements. However, we believe that certain of the proposed disclosures would be prejudicial to a company and its investors and would create auditing challenges. We believe it is important that the Board resolve these concerns prior to the issuance of a final standard. Once addressed, however, we anticipate that the disclosure requirements would provide incremental, but only marginal, improvements over the loss contingency disclosure requirements that exist today. In any event, as more fully described in our cover letter, we do not believe that companies should provide disclosures of certain asserted remote contingencies.

**6. Do you agree that *nonpublic entities* should be exempt from the tabular reconciliation disclosures required in the amendments in this proposed Update? If not, please explain why. Are there any other aspects of the amendments that should be applied differently to nonpublic entities? If so, please identify and explain why.**

If the tabular reconciliation requirement remains in the standard, we agree that nonpublic entities should be exempt from the requirement. We agree with the Board that users of financial statements of nonpublic entities generally have access to information that is not available to users of financial statements of public entities, and that the benefits of a tabular reconciliation may not outweigh the costs to nonpublic entities to prepare such disclosure. This exemption would be consistent with the tabular reconciliation disclosure exemption provided to nonpublic entities in the standard for uncertain income-tax positions. We do not believe that any other specific aspects of the amendments should be applied differently to nonpublic entities.

**7. The amendments in this proposed Update would defer the effective date for nonpublic entities for one year. Do you agree with the proposed deferral? If not, please explain why.**

For the reasons previously described, if a final standard is issued in 2010, the effective date should be for annual financial statements for years ending after December 15, 2011 for all entities.

**8. Do you believe that the proposed and existing XBRL elements are sufficient to meet the Securities and Exchange Commission's requirements to provide financial statement information in the XBRL interactive data format? If not, please explain why.**

Overall, we believe that the proposed and existing XBRL elements are sufficient to meet the SEC requirements. However, there are several additional elements that we would suggest to more comprehensively cover the requirements of the proposal and/or to enhance the level of precision available to preparers as they select elements to tag to the proposed disclosures. Please refer to Appendix B for our detailed recommendations in this regard.

## Appendix B - Clarifications and Editorial Changes:

### FASB Proposed Accounting Standards Update, Contingencies (Topic 450): *Disclosure of Certain Loss Contingencies*

If the Board were to proceed with a final standard, we recommend the following editorial changes be made and that the FASB consider our requests for clarification indicated below while drafting the final standard:

1. Regarding the scope of the proposal, we understand that it is the Board's intent to keep the scope consistent with the 2008 exposure draft. As drafted, it appears that there would be several unintended scope changes from the 2008 exposure draft such that contingencies in the form of asset impairments (such as receivable reserves covered in ASC Topic 310) and liabilities for insurance-related assessments (covered in ASC Topic 405) would now be within the scope of the proposal. To maintain a consistent scope with the 2008 exposure draft, we recommend that conforming amendments to the ASC be made as follows: (a) eliminate the references to 450-20-50-3 through 50-6 contained in 310-10-50-21 and replace those references with a broad reference to 450-20-50, (b) eliminate 310-10-50-24 in its entirety, and (c) amend 405-30-50-1 to eliminate the first two sentences, which refer to the disclosures in Topics 275 and 450 being applicable.

Section 450-20-15-2 specifically excludes from the scope of the guidance accounting and reporting by insurance entities, which is discussed in Topic 944. We understand that it was the Board's intention to only exclude those loss contingencies of insurance entities that are related to insurance and reinsurance contracts, specifically discussed in Topic 944. If our understanding is accurate, we recommend clarification of the language in section 450-20-15-2 to be more specific to only relate to the accounting and reporting of insurance and reinsurance contracts by insurance entities. Additionally, please clarify how this scope exclusion reconciles with the SEC Staff guidance provided in section 944-40-S99-1, which suggests that reasonably possible exposures to losses resulting from insurance and reinsurance contracts that exceed the liabilities recorded for insurance and reinsurance contracts are within the scope of the disclosure requirements in Subtopic 450-20.

2. In the Board's basis for conclusions in FASB Interpretation No. 48, *Accounting for Uncertainty in Income Taxes - an interpretation of FASB Statement No. 109* ("FIN 48," subsequently codified into ASC Topic 740), the Board concluded that there should be a presumption that a tax position will be evaluated by taxing authorities who have full knowledge of all relevant information. Thus, in a self-reporting system of taxation, detection risk is effectively prohibited from being considered in the application of FIN 48's recognition and measurement principles. On the other hand, detection risk is understood to be an appropriate consideration for purposes of applying the liability classification and early warning disclosure guidance of ASC 740.

Given this context, please clarify whether detection risk should be considered in applying the disclosure requirements in this proposal to non-income based taxes. If detection risk should not be considered, please also clarify whether non-income-based tax contingencies would then generally be considered to be asserted contingencies, even if no actual levy, fine, or request for payment from the taxing authority has been received by the preparer.

3. The proposal does not explicitly state that a company is not required to disclose the presence or terms of any settlement negotiations (as noted in BC43-BC45). For clarity, we recommend adding a statement to this effect in the actual standard that will be codified.

4. We understand that under the proposal if a loss contingency arose for a public company in the first quarter but was settled in the third quarter, the company would have to disclose it in the first- and third-quarter tabular reconciliations. For the annual tabular reconciliation, please clarify whether the company would (1) exclude such activity, since the loss contingency arose and was settled in the same annual period, or (2) include the activity, since the company already disclosed it in the quarterly financial statements.
5. Please clarify whether a loss contingency that becomes a definite liability would be excluded from the tabular reconciliation at the time it becomes a definite liability (e.g., a litigation claim that was originally reported in the tabular reconciliation for \$200 million and was subsequently settled for that amount to be paid in 20 annual installments of \$10 million).
6. The multi-period illustrative disclosure example in 450-20-55-38 through 55-43 includes disclosures that are only required for individually material contingencies. Accordingly, we recommend adding a sentence at the beginning of the example that states that the claim is individually material to the company. Additionally, the proposed multi-period illustrative disclosure example only relates to the situation of a single contingency. As the more difficult applications may be in situations involving multiple contingencies of various classes and types (and the potential aggregation of certain of those contingencies), we recommend that the Board provide additional application examples involving more complex scenarios.
7. In general, we believe that the Basis for Conclusions in the proposal should be expanded to provide more detail and insight into the considerations made by the Board when reaching its decisions. While not intended to be an all-inclusive listing of recommended enhancements, the following examples support this overall recommendation:
  - There is no discussion in the Basis for Conclusions regarding the scope considerations made by the Board in its deliberations.
  - BC28 essentially recites a portion of the requirements related to the tabular reconciliation from the proposal without providing insight into why the Board believes that qualitative descriptions of the significant activities in the tabular reconciliation are meaningful. We recommend that additional details be provided as to why the Board believes that this requirement is beneficial.
  - BC47 on the similarities and differences with international standards could be enhanced to provide more details given the heightened focus on convergence efforts currently underway.
8. Regarding the proposed additional XBRL elements, we offer the following suggestions to more accurately or more precisely provide preparers with elements that correspond with the proposed disclosures.

The following concepts should be added as XBRL elements:

- Loss contingencies, withdrawal obligations from multiemployer plans (link to 450-20-15-2b)
- Loss contingencies, non-income-based taxes (link to 450-20-15-2b)
- Amount of damages claimed (link to 450-20-50-1F (b) and (e)1)
- Total number of claims outstanding (link to 450-20-55-1D)

- Average amount claimed (link to 450-20-55-1D)
- Average settlement amount (link to 450-20-55-1D)
- Loss Contingency, Income Statement Caption (link to 450-20-50-1F(g))

For the label "Early Stage Litigation Contingency [Member]", the definition could be clarified as "During early stage(s) of the contingency's life cycle, provides disclosures to understand the nature, potential magnitude and timing (if known)."

For the label "Loss Contingency, Damages Indicated by Expert Witness" the codification reference could be more detailed as follows: 450-20-50-1F(e)(1).

For the label "Loss Contingency, Other Disclosures" the codification reference could be more detailed as follows: 450-20-50-1F(e)(4).

For the label "Loss Contingency, Possible Recoveries from Insurance" the codification reference could be more detailed as follows: 450-20-50-1F(e)(5).

For the label "Loss Contingency, Possible Recoveries from Insurance, Denial, Contested, or Reserved Rights" the codification reference could be more detailed as follows: 450-20-50-1F(e)(5).

For the label "Loss Contingency, Accrual Carrying Value, Current" the codification reference could be more detailed as follows: 450-20-50-1F(g).

For the label "Loss Contingency, Accrual Carrying Value, Noncurrent" the codification reference could be more detailed as follows: 450-20-50-1F(g).

For the label "Malpractice Loss Contingency Disclosure [Text Block]" the added codification reference of 450-20-50-F should be 450-20-50-1F.

For the following labels, the codification reference to 450-20-50-1F(e)(5) should be edited to be only 450-20-50-1F ~~(e)(5)~~:

- Malpractice Loss Contingency, Period Cost
- Malpractice Loss Contingency, Accrual Adjustment
- Malpractice Loss Contingency, Settlement of Claims

The label "Public Utilities, Disclosure of Regulatory Matters Pending" has a codification reference to 980-20-50-6, a paragraph which does not appear in the Codification.

The label "Reinsurance, Loss on Uncollectible Accounts in Period, Description" has a codification reference 450-20-50-1, which should be deleted in lieu of the more specific sub-paragraph 450-20-50-1F that is also referenced.

The following codification references to the existing and proposed XBRL elements should be revised:

- Loss Contingency Accrual, at Carrying Value: eliminate reference to 450-20-50-1F(g)
- Loss Contingency Accrual, Carrying Value, Provision: eliminate reference to 450-20-50-1F(g)
- Loss Contingency Accrual, Carrying Value, Increase due to change in estimate: eliminate reference to 450-20-50-1F(g)
- Loss Contingency Accrual, Carrying Value, Decrease due to change in estimate: eliminate reference to 450-20-50-1F(g)
- Loss Contingency Accrual, Carrying Value, Payments: edit reference to 450-20-50-1F(g)(5)

Eliminate reference to 450-20-50-6 (which is being superseded) from the following labels, and replace that reference with 450-20-50-1C instead:

- Schedule of Loss Contingencies by Contingency or Class of Contingency
- Loss Contingency Disclosures
- Loss Contingencies [Table]
- Loss Contingencies by Nature of Contingency [Axis]
- Loss Contingency, Nature [Domain]
- Discontinued Operation, Description of Material Contingent Liabilities Remaining
- Malpractice Loss Contingency Disclosure [Text Block]
- Malpractice Loss Contingency, Accrual Not Recognized
- Malpractice Loss Contingency, Description
- Product Liability Contingencies
- Product Liability Contingency [Table]
- Product Liability Contingency, Geographic Areas
- Product Liability Contingency, Loss Exposure Not Accrued, Description
- Product Liability Contingency, Loss Exposure Not Accrued, Best Estimate
- Reinsurance, Loss on Uncollectible Accounts in Period, Description