

Overall, we believe that it will be very onerous and costly to apply the Exposure Draft as drafted. In particular, we are concerned with the requirement to use relative stand-alone selling price in allocating revenue because the benefits of such changes in revenue accounting do not seem sufficient to warrant the cost to the telecom industry in Japan. We hope that the IASB will consider our comments carefully and make appropriate modifications to the Exposure Draft in its final standards.

If you should have any questions, please do not hesitate to contact Motoyuki Suzuki of KDDI IFRS-Team at mo-suzuki@kddi.com.

Very truly yours,

Handwritten signature of Masato Takei in cursive script.

Masato Takei, General Manager, Accounting
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