

November 3, 2010

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

File Reference No. EITF100G

Re: Proposed Accounting Standards Update, "Disclosure of Supplementary Pro Forma Information for Business Combinations"

We appreciate the opportunity to respond to the Financial Accounting Standards Board's (FASB or the "Board") Proposed Accounting Standards Update, "Disclosure of Supplementary Pro Forma Information for Business Combinations" ("the Exposure Draft"). We fully support the Board's efforts to address diversity in practice regarding the interpretation of the pro forma revenue and earnings disclosure requirements for business combinations.

Question 1 - Do you agree that if comparative financial statements are presented, the acquisition date that should be used for reporting the supplemental pro forma disclosure in Topic 805 should be only as of the beginning of the prior annual reporting period? If not, why not?

We agree that the acquisition date used for reporting supplemental pro forma disclosures under Topic 805 should be as of the beginning of the first annual reporting period presented when comparative periods are presented. This approach more faithfully represents an estimate of the comparative information that would assist users in understanding the effect of a business combination. We believe the purpose of pro forma information is to inform the financial statement users about the estimated impact on the reported periods to gain an understanding of the trend that would have occurred in certain elements of the results of operations of the acquirer had the transaction occurred at the earliest date presented. We do not believe users are benefited by pro forma information that assumes identical transactions occurred at the beginning of each reporting period presented as there is no ability for a user to understand the trends that result from the passage of time.

Question 2 - Do you agree that the additional disclosure of a description of the nature and amount of material, nonrecurring pro forma adjustments will provide useful information? If not, why not?

We agree that the additional disclosure proposed by the Exposure Draft will provide useful information, and we support the Board's efforts to more closely align the pro forma requirements of Topic 805 with the SEC's requirements under Article 11 of Regulation S-X. However, we recommend that the Board adopt pro forma requirements that are more closely aligned with the SEC's requirements under Article 11 of Regulation S-X. We believe such a modification would be consistent with the Board's objective of comparability, consistency and would address certain of the objections related to "disclosure overload" if the requirements were identical. We do not believe differences in the basis of presentation of pro forma requirements for business combinations between the SEC and the FASB benefit users of financial statements, but rather make their review more cumbersome and complicated. Additionally, such differences increase the complexity associated with compliance for preparers.

File Reference No. EITF100G - Disclosure of Supplementary Pro Forma Information Properties No. 2 Combinations

Page 2

Question 3 - Do you agree that the amendments in this proposed Update should be applied prospectively, with early adoption permitted? If not, why not?

We agree that the amendments in this proposal should be applied prospectively for business combinations that are consummated on or after the beginning of the first annual reporting period in which the Update is adopted.

Question 4 - Do you believe that the effective date provides enough time for financial statement preparers to effectively implement the proposed amendments? If not, why not?

We believe the effective date provides sufficient time for preparers to effectively implement the proposed amendments.

We appreciate the opportunity to express our views and would be pleased to discuss our comments or answer any questions that the FASB staff or the Board may have. Please contact me at 913-315-7600 should you have any questions regarding our submission.

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Vice President – Controller
Sprint Nextel Corporation