

KPMG LLP 757 Third Avenue New York, NY 10017 Telephone 212 909 5600 Fax 212 909 5699 Internet www.us.kpmg.com

December 21, 2010

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

RE: Proposed Accounting Standards Update, "Receivables (Topic 310), Deferral of the Effective Date of Disclosures about Troubled Debt Restructurings in Update No. 2010-20" (File Reference No. 1900-200)

Dear Technical Director:

We appreciate the opportunity to respond to the proposed Accounting Standards Update, "Receivables (Topic 310), Deferral of the Effective Date of Disclosures about Troubled Debt Restructurings in Update No. 2010-20" (the "proposed update"). We support the Board's proposal to defer the effective date of disclosures about troubled debt restructurings (TDRs) required by Accounting Standards Update No. 2010-20, "Receivables (Topic 310), Disclosures about the Credit Quality of Financing Receivables and the Allowance for Credit Losses" for public companies until the effective date of the guidance within proposed Accounting Standards Update, "Receivables (Topic 310), Clarifications to Accounting for Troubled Debt Restructurings by Creditors" (the "proposed ASU").

If the proposed update is adopted, the deferral is likely to reduce the operational burden on financial statement preparers. Additionally, financial statement users are less likely to be confused by an entity's TDR disclosures if the effective dates of Update 2010-20 and the proposed ASU are aligned.

Lastly, depending on the finalization date of the proposed ASU and its effective date, the Board may need to reconsider the effective date of the TDR disclosures in ASU 2010-20 for nonpublic companies.

If you have any questions about our comments, please contact Mark Bielstein at (212) 909-5419 or Enrique Tejerina at (212) 909-5530.

Sincerely,

