



November 23, 2011

Technical Director
Financial Accounting Standards Board
401 Merrit 7
P.O. Box 5116
Norwalk, CT 06856-5166

Re: Proposed Accounting Standards Update, "Deferral of the Effective Date for Amendments to the Presentation of Reclassifications of Items Out of Accumulated Other Comprehensive Income in Accounting Standards update No. 2011-05" (File Reference No. 2011-240)

Dear Technical Director:

The Allstate Insurance Company ("Allstate" or "we") is pleased to provide comments to the Financial Accounting Standards Board ("FASB" or "Board") on the proposed Accounting Standards Update, *Deferral of the Effective Date for Amendments to the Presentation of Reclassification of Items Out of Accumulated Other Comprehensive Income in Accounting Standards Update No. 2011-05* ("Proposed ASU").

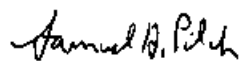
We agree with the Board's decision to defer the effective date of ASU 2011-05 specifically relating to the presentation of items reclassified out of accumulated other comprehensive income ("AOCI") and into net income. We believe this deferral should be permanent. More specifically, we believe the complexity that would be added both to the construction of the income statement and investors' ability to understand periodic changes is not cost justified. In contrast, we believe the existing requirements that present reclassifications in the statement of comprehensive income and in the financial statement footnotes effectively meet the needs of investors.

In addition to considering the operationality, and costs benefit considerations of separately presenting reclassifications out of AOCI in the income statement, the Board should focus on the understandability of financial statements and strive to make them as simple and understandable as possible; we believe a permanent deferral of the proposal would help achieve that objective.

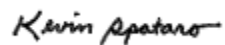
Furthermore, we believe as part of the joint financial statement presentation project, the FASB should discuss with the IASB the nature of comprehensive income and how separate presentation of reclassifications from AOCI and into net income should be accomplished.

We appreciate the opportunity to comment on the Proposed ASU. If you desire a further discussion of our views, please contact me at (847) 402-2213 or Kevin Spataro at (847) 402-0929.

Sincerely,



Samuel H. Pilch
Senior Group Vice President & Controller
The Allstate Insurance Company



Kevin Spataro
Senior Vice President- Accounting Policy & Research
The Allstate Insurance Company