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Ms. Susan M. Cosper
Technical Director
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

December 13, 2011

Re: File Reference 2011-190

Dear Ms. Cosper:

MetLife, Inc. (MetLife) is pleased to comment on the Proposed Accounting Standards Update, *Technical Corrections*, (the Proposed ASU).

MetLife supports the FASB's continued formal process to address feedback received from stakeholders on the Codification. Our review of the Proposed ASU focused on areas relevant to for-profit organizations. In this regard, we have no disagreements with any of the proposed revisions to the codification. Except as noted in the Proposed ASU, we do not believe that the proposed revisions will result in substantive changes to the application of existing guidance that would require transition provisions.

In addition, we wanted to take this opportunity to point out an additional change that we believe needs to be made to the Codification. It relates to certain guidance that, in our view, should have been updated in ASC 944, Financial Services – Insurance, in conjunction with ASU 2010-26, *Accounting for Costs Associated with Acquiring or Renewing Insurance Contracts*. Specifically, the following two paragraphs under Subtopic 30 of ASC 944 continue to refer to terms associated with pre-codification guidance on deferred acquisition costs, such as "vary with" and "primarily related to", with no indication of update upon the effective date of ASU 2010-26. As such, we believe it is necessary to conform the language in these sections (reproduced below) with the guidance in ASU 2010-26 to avoid potential misinterpretation.

Limited-Payment Contracts

25-8 Costs related to the acquisition of new and renewal business that are not capitalized (because, for example, the costs do not vary with the acquisition of the business) are period costs that shall be recognized when incurred. Such costs shall not be included in the calculation of **net premium** used in determining the profit to be deferred on **limited-payment contracts** because the inclusion of such costs in the calculation of net premium would result in their deferral.

25-9 Costs that would be included in the determination of net premium under this Subtopic for such contracts and for purposes of determining the deferred profit for limited-payment contracts are policy-related costs that are not primarily related to the acquisition of business (such as policy administration, maintenance, and settlement costs) and acquisition costs that are capitalized under this Subtopic for such contracts.

We appreciate the opportunity to comment on the Proposed ASU and are available to discuss this letter at your convenience.

Sincerely,

Robert C. Tarnok

cc: Peter M Carlson
Executive Vice President and
Chief Accounting Officer