December 15, 2009

Sir David Tweedie, Chairman
International Accounting Standards Board
30 Cannon Street, First Floor
London EC4M 6XH
United Kingdom

Dear Sir David:

Re: Use of OCI for insurance liabilities

We, the undersigned Japanese life insurers, sincerely appreciate the efforts of the IASB to develop an international accounting standard for insurance contracts.

We note that the IASB is scheduled to discuss the use of other comprehensive income for remeasurements of insurance liabilities in its meeting on December 15. As background for this discussion, we would like the Board members to review the letters and attachment (a question and answer document) sent jointly by the Group of North American Insurance Enterprises (GNAIE) and us on July 25, 2008, February 4, 2009, and October 27, 2009.

Permitting insurers to use other comprehensive income for remeasurements is essential for reliable and decision-useful presentation of performance of insurers. We believe it should be avoided to adopt a solution to the mismatch problem that would lead to a lack of comparability between financial reporting for insurers and for other financial institutions, such as banks. Upon these points, we share GNAIE’s views expressed in its letter to the Board dated December 11, 2009.

We hope that our inputs will be of help to the Board in its upcoming discussion. If you, any Board member or staff would like clarification of our position on this issue, we would be glad to provide it.

Sincerely,

Nippon Life Insurance Company, Yoshinobu Tsutsui, Senior Managing Director
Dai-ichi Life Insurance Company, Kazuma Ishii, Director, Managing Executive Officer
Meiji Yasuda Life Insurance Company, Hiroaki Tonooka, Senior Managing Executive Officer
Sumitomo Life Insurance Company, Yutaka Amino, Managing Director

cc: Robert H. Herz, Chairman, FASB
    IASB/FASB Board Members
    Peter Clark, Director of Research, IASB
    Hans van der Veen, Practice Fellow, IASB
    Jeffrey Cropsey, Project Manager, FASB