September 12, 2019

Technical Director
File Reference No. 2019-750
Financial Accounting Standards Board
401 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116

Re: Proposed Accounting Standards Update, Financial Instruments - Credit Losses (Topic 326), Derivatives and Hedging (Topic 815) and Leases (Topic 842): Effective Dates

Dear Technical Director:

Cox Enterprises, Inc. ("Cox", "we") is a leading broadband communications, automotive services and media company, with revenues exceeding $21 billion. We appreciate the opportunity to provide comments on the Proposed Accounting Standards Update, Financial Instruments - Credit Losses (Topic 326), Derivatives and Hedging (Topic 815) and Leases (Topic 842): Effective Dates (the "Proposed Update"). We are supportive of the amendments outlined in the Proposed Update.

We appreciate the Board’s commitment to engage with interested parties, especially those impacted by the new standards. Thank you for the opportunity to respond to this proposed accounting standards update.

Questions for Respondents

1. Is the two-bucket approach described and applied in this Update understandable? If not, please explain why.
   
   Cox’s response: Yes, we understand the two-bucket approach.

2. Should the population of SEC filers that are afforded a delayed effective date (that is, excluded from bucket one) be entities eligible to be SRCs as defined by the SEC? If not, what definitional threshold, if any, do you suggest and why?
   
   Cox’s response: Yes, we agree that SRCs should be excluded from bucket one.

3. Should the determination of whether an entity is eligible to be an SRC be based on its most recent determination in accordance with SEC regulations as of the date that a final Update is issued? If not, what determination date should be applied?
Cox’s response: Yes, we agree basing the eligibility on the most recent determination as of the final Update issuance is reasonable.

4. Should Credit Losses be effective for entities eligible to be SRCs, private companies, not-for-profit organizations, and employee benefit plans for fiscal years beginning after December 15, 2022, including interim periods within those fiscal years? If not, please explain why.

Cox’s response: Yes, we agree with the proposed delay.

5. Should Hedging be effective for all entities other than public business entities for fiscal years beginning after December 15, 2020, and interim periods within fiscal years beginning after December 15, 2021? If not, please explain why.

Cox’s response: Yes, we agree with the proposed delay.

6. Should Leases be effective for (a) private companies, (b) not-for-profit organizations (excluding those that have issued or are conduit bond obligors for securities that are traded, listed, or quoted on an exchange or an over-the-counter market), and (c) employee benefit plans (excluding those that file or furnish financial statements with or to the SEC) for fiscal years beginning after December 15, 2020, and interim periods within fiscal years beginning after December 15, 2021? If not, please explain why.

Cox’s response: Yes, we agree with the proposed delay.

7. This question is for future major Updates and not the amendments in this proposed Update. Under the revised effective date philosophy, certain PBEs, including SRCs, and nonpublic business entities would have a deferred effective date. Should interim reporting be required in the same year as the annual financial statements or in the subsequent year for these entities when they provide interim financial statements?

Cox’s response: Allowing these entities to wait until the subsequent year to provide interim financial statements is helpful. Likely, the entities do not have a robust interim financial reporting process and the additional time would be beneficial.

Respectfully,

[Signature]

Jack Polish
Cox Enterprises, Inc.
Vice President and Controller