October 5, 2015

   File Reference No. EITF-15D

Dear Ms. Cosper:

MetLife, Inc. ("MetLife" or "we") appreciates the opportunity to provide comments on the FASB’s Exposure Draft, Derivatives and Hedging (Topic 815): Effect of Derivative Contract Novations on Existing Hedge Accounting Relationships (the “Exposure Draft”). MetLife is a leading global provider of insurance, annuities and employee benefit programs. Through its subsidiaries and affiliates, MetLife holds leading market positions in the United States, Japan, Latin America, Asia, Europe and the Middle East.

MetLife commends the Board on its efforts to clarify the guidance in Topic 815 with respect to the novation of derivative contracts. We agree with the Board’s conclusion in the Exposure Draft that a change in the counterparty to a derivative that has been designated as the hedging instrument under Topic 815 does not, in and of itself, require redesignation of the hedge accounting relationship provided all other hedging accounting criteria continue to be met. We agree that redesignating a hedge accounting relationship upon a novation would not provide decision-useful information and also support the general convergence of these proposed provisions with International Financial Reporting Standards ("IFRS"). We encourage the Board to consider, where possible, other opportunities to converge with IFRS with respect to hedge accounting.

We appreciate the opportunity to comment on the Exposure Draft and offer our perspective. We have also attached our responses to the questions contained in the Exposure Draft. If you have any questions on the contents of this letter, please do not hesitate to call me.

Sincerely,

Peter M. Carlson

cc: John C.R. Hele
   Executive Vice President and Chief Accounting Officer
Appendix

Set forth below are our specific comments with respect to the questions in the Exposure Draft.

**Question 1:** Do you agree that a change in the counterparty to a derivative instrument that has been designated as the hedging instrument in an existing hedge accounting relationship should not, in and of itself, require dedesignation of that hedge accounting relationship?

We agree that such a change should not, in and of itself, require dedesignation.

**Question 2:** Do you agree that the effects of initially adopting the amendments in this proposed Update should be applied on a prospective basis to all existing and new hedge accounting relationships in which a change in the counterparty to a derivative instrument occurs after the effective date of the proposed guidance?

We agree that the effects should be applied on a prospective basis to all existing and new hedge accounting relationships for changes in the counterparty occurring after the effective date.

**Question 3:** There may be circumstances in which entities have previously dedesignated a hedge accounting relationship upon the occurrence of a novation that, under the proposed amendments, would no longer result in a dedesignation. Those entities may have been following an abbreviated qualitative method of hedge accounting (for example, the shortcut method) before the dedesignation and either (a) redesignated the hedge under the long-haul method or (b) chose not to redesignate the hedge as a result of the complexities of applying the long-haul method when using an off-market derivative as the hedging instrument. Is the scenario described above prevalent? If so, for those entities that had been applying an abbreviated qualitative method of hedge accounting before a dedesignation resulting from a past novation, should the Task Force consider permitting, but not requiring, retrospective transition?

Although we do not have enough information to comment on whether the described scenario is prevalent, we would not oppose retrospective transition, provided it is optional.

**Question 4:** The proposed amendments would apply to all entities. Should the proposed amendments be different for entities that are not public business entities? If so, please describe how and why you think they should be different.

We agree that the proposed amendments should apply to all entities.

**Question 5:** How much time would be needed to implement the proposed amendments and should the implementation period differ for public business entities versus all other entities? Should this guidance be effective upon issuance? If the guidance is not effective upon issuance, should early adoption be allowed? Please explain why.

Significant time should not be needed to implement the proposed amendments prospectively. Given the clarifying nature of this guidance, we believe it should be effective upon issuance. Alternatively, it could be issued with a later effective date, but should allow for early adoption as of the date issued.
Question 6: Should a reporting entity be required to provide the transition disclosures specified in the proposed Update? Should any other disclosures be required? If so, please explain why.

We are not opposed to the transition disclosures specified in the Exposure Draft being required, subject to materiality considerations.