Re: File Reference No. 2011-240

Dear Sir,

MetLife, Inc. (MetLife) is pleased to comment on the FASB’s Exposure Draft: Comprehensive Income (Topic 220); 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.

We understand that the FASB has received additional information about the costs to preparers from the change in presentation requirements for reclassifications out of accumulated other comprehensive income and appreciate the concerns raised relating to potential complexity to financial statement presentation. While we believe ASU 2011-05 is a positive move toward transparency, we agree with the decision to defer the presentation requirements for reclassifications out of other comprehensive income until a reassessment is completed to achieve the objective of reducing the cost and complexity of the standard while maintaining a high quality standard that provides useful information.

The following comments are provided in context of each question posed in the proposed Exposure Draft.

Question #1:

Do you agree with the deferral? Why or why not?

MetLife agrees with deferring only those changes in ASU 2011-05 that relate to the presentation of reclassification adjustments. This will allow the FASB sufficient time to reassess costs and benefits associated with these requirements and to evaluate alternative presentation formats which
we believe should be considered. In preparing a pro-forma statement of net income under the new requirements we noted that it resulted in numerous additional line items, including several insignificant items, effectively cluttering and unnecessarily adding complexity to this core statement. We believe that the objectives of ASU 2011-05 could still be met under an alternative presentation approach.

**Question #2 and #3:**

*Are there alternatives that the Board should consider for presenting reclassifications out of accumulated other comprehensive income that would be more cost effective than the one required by Update 2011-05?*

We believe that the effect of reclassification of the components of net income and the components of other comprehensive income should not be required to be presented in both the statement where net income is presented and the statement where other comprehensive income is presented. Rather, the reclassifications should be presented only in the statement where other comprehensive income is presented or as an optional footnote to the financial statements. This would apply regardless of whether the entity elects to present other comprehensive income in one statement or two. We believe that this approach would alleviate some of the cost and complexity of the standard and remove unnecessary complexity to the income statement while still satisfying the objectives of ASU 2011-05.

Sincerely,

Peter M. Carlson

cc: William J. Wheeler
    Executive Vice President and
    Chief Financial Officer