September 29, 2016

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

File Reference No. 2016-320

Dear Ms. Cosper:

RSM US LLP appreciates the opportunity to comment on the Proposed Accounting Standards Update (ASU), Technical Corrections and Improvements to Update No. 2014-09, Revenue from Contracts with Customers (Topic 606) – Additional Corrections (the “proposed Update”). Overall, we are supportive of the actions the Board has taken to address questions and issues arising in the implementation of the new revenue recognition model provided in ASU 2014-09. As it relates to the proposed Update, we are supportive of the various technical corrections included therein. Provided below for your consideration are our responses to the “Questions for Respondents” on which specific comment was requested.

Responses to Questions for Respondents

**Question 1:** The proposed amendments are intended to improve the clarity of the scope of Topic 606 for guarantees (other than product or service warranties) that are within the scope of Topic 460, Guarantees. Would the proposed amendments clarify the scope of the guidance? If not, please explain why and suggest alternatives. (Issue 1)

We agree that the proposed amendments clarify the scope of Topic 606 for guarantees (other than product or service warranties) that are within the scope of Topic 460, *Guarantees*.

**Question 2:** The proposed amendments are intended to provide a better link between Example 38, Case B in Topic 606 and the presentation guidance in paragraphs 606-10-45-2 through 45-4. Would the proposed amendments better align the example with the guidance? If not, please explain why and suggest alternatives. (Issue 2)

We agree that the proposed amendments better align Example 38, Case B in Topic 606 with the presentation guidance in paragraphs 606-10-45-2 through 45-4.

**Question 3:** The proposed amendments are intended to improve the clarity of Example 40 in Topic 606 by removing the term contract liability from the journal entry in the example. Would the proposed amendments improve the clarity of the example? If not, please explain why and suggest alternatives. (Issue 3)

We agree that the proposed amendments improve the clarity of Example 40 in Topic 606.
Question 4: The proposed amendments would reinstate the guidance on accrual of advertising costs that was previously included in paragraph 340-20-25-2. Do the proposed amendments improve the clarity of the accounting? If not, please explain why and suggest alternatives. (Issue 4)

We agree that the proposed amendments improve the clarity of the accounting for the accrual of advertising costs.

We appreciate this opportunity to provide feedback on the proposed Update and would be pleased to respond to any questions the Board or its staff may have concerning our comments. Please direct any questions to Rick Day (563.888.4017) or Brian H. Marshall (203.905.5014).

Sincerely,

RSM US LLP