Letter of Comment No: 21
File Reference: 1205-001
Date Received: 10, 28.05

----Original Message-----

From: yasuhito.fukuda@sumitomocorp.co.jp [mailto:yasuhito.fukuda@sumitomocorp.co.jp]

Sent: Friday, October 28, 2005 12:06 AM

To: Director - FASB

Cc: Yasuhito.fukuda@sumitomocorp.co.jp

Subject: replacement of ARB No. 51

My name is Yasuhito fukuda. I'm working for Sumitomo corporation(Tokyo, Japan).

As for the following paragraph

33. The following provisions shall be applied retrospectively:

e. Gains or losses recognized in net income for decreases in a parent's controlling ownership interest in a subsidiary that did not result in a loss of control of that subsidiary shall be reclassified from net income to equity.

----EXPOSURE DRAFT

Proposed Statement of Financial Accounting Standards Consolidated Financial Statements, Including Accounting and Reporting of Noncontrolling Interests

in Subsidiaries a replacement of ARB No. 51

If preparer distribute earnings generated from above transaction, how does preparer apply the treatment retrospectively?