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 Director - FASB

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Subject: Comments on the Proposed Accounting Standards Update No. 1790-100

Date: Monday, June 14, 2010 2:17:31 AM

Thank for the opportunity to provide comments on the Proposed Accounting Standards Update on Other Comprehensive Income (No.1790-100). I support most of the changes contained in the proposed update. I think it is very sensible to remove the option permitting components of net income and comprehensive net income to be displayed in separate statements. Financial statements are complicated enough for investors to understand. This option to display these components in different ways makes it difficult to investors to compare financial statements from different companies. The resulting confusion may cause inefficiency in the capital markets.

Although I support these changes, I have some concerns about the proposal to apply them on a fully retrospective basis. I understand the desire to improve comparability between reporting periods, but I wonder whether requiring companies to restate their prior year financial statements is necessary in light of the cost to those companies. Companies made the decision to report components of net income and comprehensive net income based on guidance in effect at the time. Even though they followed that guidance, they would now be penalized by being forced to pay their accountants to restate the prior year statements. Therefore, I respectfully recommend that the Board reconsider the need to apply these changes on a retrospective basis.

Thank you,

University of Hawaii at Manoa Akiko Wilson