

From: [Nino Koo](#)
To: [Director - FASB](#)
Subject: File Reference No. 1790-100
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June 13, 2010

Attn: Technical Director

RE: 1790-100 "Comprehensive Income"

As a graduate student that is pursuing a Master's of Accounting degree, I am thankful for the opportunity to comment on the Exposure Draft of the Proposed Accounting Standard Update for Comprehensive Income. While my opinions are theoretically based, I believe that the provisions of this Proposed Accounting Standard Update will indeed improve the comparability, transparency, and understandability in financial reporting.

It would seem less confusing for users by eliminating two of the three options for reporting comprehensive income. By having multiple options for reporting, it is more difficult to attain a greater sense of comparability. I would agree that a continuous financial statement similar to the one statement approach would be best suited for being both comprehensive as well as increase prominence to other comprehensive income.

The one statement approach has always been the most comprehensive and intuitive option as it lists all the components of net income first and then subsequently adds the components of other comprehensive income within the same statement. The emphasis in displaying the components of both net income and other comprehensive income further increases the level of financial reporting transparency. Whereas reporting it separately in the two statement option, other comprehensive income can be overlooked in favor of net income.

At this time I do not feel any changes in the calculation and display of earnings per share should be made as a result of the proposed update. The inclusion of other comprehensive income into the calculation for example, would not necessarily make the calculation any more transparent but rather confuse users who are accustomed to relying on the current calculation of earnings per share.

Thank you for the opportunity to comment on the Exposure Draft. I believe that the Accounting Standards Update is on the right track to improving financial reporting.

Sincerely,

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