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November 21, 2011

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

## File Reference No. 2011-240

Re: Proposed Accounting Standards Update, 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

Dear Ms. Cosper:

Deloitte & Touche LLP is pleased to comment on the FASB's proposed Accounting Standards Update (ASU), 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 agree with the proposed ASU's indefinite deferral of the provisions in FASB Accounting Standards Update No. 2011-05, *Presentation of Comprehensive Income*, related to the presentation of reclassification adjustments. We believe this deferral will give the Board sufficient time to adequately evaluate the concerns raised by constituents regarding these provisions.

When the Board deliberates these matters, it should consider an alternative that would permit the effects of reclassification adjustments classified out of accumulated other comprehensive income and into the statement of net income to be disclosed in the notes to the financial statements instead of presented on the face of the financial statements. We believe this option would be more cost effective for preparers to implement and would better serve the needs of users by reducing the potential presentation complexity in the financial statements. As a result, users would be able to focus on the more significant aspects of the financial statements while still having access to information on reclassification adjustments in the footnotes.

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Deloitte & Touche LLP appreciates the opportunity to comment on the proposed ASU. If you have any questions concerning our comments, please contact Bob Uhl at (203) 761-3152 or Stuart Moss at (203) 761-3042.

Yours truly,

Deloitte & Touche LLP