

November 22, 2011

American Electric Power 1 Riverside Plaza, 28th Floor Columbus, 0H 43215 AEP.com

Joseph M. Buonaiuto Senior Vice President & Chief Accounting Officer

614-716-2821 Fax 614-716-3873 jmbuonaiuto@aep.com

Technical Director
File Reference No. 2011-240
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

Subject: Comment Letter Regarding 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 Director:

American Electric Power Company, Inc. (AEP) appreciates the opportunity to respond to the Financial Accounting Standards Board's (FASB or the Board) Exposure Draft (ED) "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", dated November 8, 2011. AEP, a Columbus, Ohio based energy company, is one of the largest investor-owned utilities operating in the United States, with revenues of over \$13 billion and more than 19,000 employees. We provide energy to approximately 5 million customers in Arkansas, Indiana, Kentucky, Louisiana, Michigan, Ohio, Oklahoma, Tennessee, Texas, Virginia and West Virginia.

We support the deferral so the Board can address preparers' implementation concerns and provide clarification of certain issues. We believe reclassification adjustments should only be shown on the face of the financial statements when the line item is material to the overall presentation of the financial statements. Without a materiality limitation, reclassification adjustments will make the face of the statements more difficult to read and distract from more important elements. We also suggest the Board clarify the standard to specifically allow parenthetical presentation of the reclassification adjustments which would greatly improve readability.

We agree with others who suggest clarification is needed regarding certain items that are reclassified out of accumulated other comprehensive income to a balance sheet account and subsequently reclassified to net income at a later date. Our interpretation of the standard as issued is that these items would be shown as reclassifications within the balance sheet in the statement of comprehensive income and would not be shown as

reclassification adjustments on the income statement in the period of reclassification or subsequent periods.

Sincerely,

Joseph M. Buonaiuto