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October 15, 2012

Technical Director
Financial Accounting Standards Board
401 Merrit 7
PO Box 5116
Norwalk, CT 06856-5116

Re: Proposed Accounting Standards Update, "Presentation of Items Reclassified Out of Accumulated Other Comprehensive Income" (File Reference No. 2012-240)

Dear Technical Director:

We appreciate the opportunity to respond to the proposed Accounting Standards Update, *Presentation of Items Reclassified Out of Accumulated Other Comprehensive Income* (the proposed ASU). Before the Board establishes additional disclosure requirements related to other comprehensive income (OCI), we believe the Board should first undertake a broader project to consider the nature of other comprehensive income (OCI), including whether it is a performance measure, and whether or when reclassification into net income is appropriate. As noted in our comment letter to the original proposed ASU on the presentation of OCI (May 2010) and related proposed deferral of the presentation of reclassification adjustments (November 2011), we believe the Board should strive to reduce or eliminate the inconsistencies between U.S. GAAP and IFRSs in the accounting for and presentation of items in OCI.

Additionally, the Board's efforts on the Disclosure Framework project may provide useful information about how best to present information related to comprehensive income. While the tabular disclosure requirements in the proposed ASU may make it clearer to the users of the financial statements where reclassifications out of accumulated other comprehensive income (AOCI) are recognized in net income, those requirements may also result in redundancy since much of this information is currently required to be presented throughout the financial statements under existing U.S. GAAP for both public and nonpublic entities.

Although we are not aware of significant difficulties that would be encountered in providing the additional disclosures, we believe that further efforts by the Board on a broader project on OCI and its Disclosure Framework project would be useful before establishing new disclosure requirements on OCI.

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Our responses to the Board's specific questions on the proposed ASU not already addressed in this letter are set forth in the accompanying Appendix. If you have any questions about our comments or wish to discuss any of the matters addressed herein, please contact Mark Bielstein at (212) 909-5419, mbielstein@kpmg.com, or Paul Munter at (212) 909-5567, pmunter@kpmg.com.

Sincerely,

KPMG LLP

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Appendix A: Responses to the questions set out in the FASB's Exposure Draft

Q1 The proposed amendments would require an entity to provide enhanced disclosures to present separately by component reclassifications out of accumulated other comprehensive income. In addition, an entity would be required to provide a tabular disclosure of the effect of items reclassified out of accumulated other comprehensive income on the respective line items of net income, to the extent that the items reclassified are required under U.S. GAAP to be reclassified to net income in their entirety. In addition, for other items not required under U.S. GAAP to be reclassified in their entirety to net income, the tabular disclosure would require only a cross-reference to other disclosures providing additional detail about these reclassifications. Would the proposed disclosures provide useful information to users of financial statements? If not, please explain why.

KPMG Response:

See the discussion in our letter.

Q2 Would an entity incur significant costs because of the proposed amendments in Question 1? If so, please explain the nature of those costs. The proposed amendments also would require an entity to provide the disclosures about the effect of reclassifications out of accumulated other comprehensive income by component both on an interim basis and on an annual basis. Would an entity incur significant costs because of the proposed requirement for interim-period disclosures? If so, please explain the nature of those costs.

KPMG Response:

We do not expect the proposals contained in this exposure draft to result in significant costs to most financial statement preparers on an annual or interim basis.

Q3 The proposed guidance would apply to both public entities and nonpublic entities (that is, private companies). Should any of the proposed amendments be different for nonpublic entities? If so, please identify those proposed amendments and describe how and why you think they should be different.

KPMG Response:

No, we are not aware of any reasons that the proposed amendments should be different for nonpublic entities.

Q4 The Board has discussed the possibility of making these proposed amendments effective for public entities as early as for annual reporting periods ending after December 15, 2012, and to delay the effective date for nonpublic entities by one year. Would those effective dates be practicable? If not, please explain why.

KPMG Response:

We believe the proposed effective dates are practicable.