

We support an approach that would use the business model to define the criteria for classifying and measuring financial assets at AC or FV-NI and designate FV-OCI as the “default” category. We also recommend the board expands the definition of the SPPI test to include “substantially all” the cash flows of the instrument that are payments of principal and interest.

We further recommend that this proposal be considered in its entirety with an effective date simultaneous with the *Financial Instruments-Credit Losses* ED and the insurance contract proposal. The alignment of these dates is necessary to avoid confusion on the part of the users given that these standards are all so closely linked.

Thank you for considering our comments. If you have any questions or wish to discuss our comments, please contact me at (920) 830-4371.

Sincerely,

Jeffrey R Kargus
Controller
SECURA Insurance Companies

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