

March 3, 2015

Dear FASB Director:

RE: the proposed ASU for “Derivatives and Hedging (Topic 815) Disclosures about Hybrid Financial Instruments with Bifurcated Embedded Derivatives”

The method of calculating the values of a bifurcated derivative and its host contract are not well-known. The source is DIG Issue B6 which is encoded as ASC 815-15-30-2. In order for a user of financial statements to understand fully the linking between a bifurcated derivative and its host, as proposed, the disclosures should explain the method used to determine the carrying amount of the host contract.

Sincerely,

Allen Schulman