



February 9, 2016

Sent via e-mail: director@fasb.org

Financial Accounting Standards Board
401 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116

Re: File Reference No. 2015-340

AT&T, Inc. is pleased to respond to the Financial Accounting Standards Board's exposure draft on Disclosures by Business Entities about Government Assistance. The proposed standard is of interest to us as a leading provider of communications and digital entertainment services operating in the United States and around the world.

We understand and support the desire for more transparency of material assistance from governmental agencies, but have concerns that the scope of the exposure draft may have unintended negative consequences. The proposed standard does not differentiate between court and regulatory settlements and company specific agreements with governmental authorities. There are many disputes about the legal meaning and intention of various tax and regulatory fee statutes which often result in regulatory and/or judicial appeals with tax or governmental entities. The proposed scope of the standard might be interpreted to include some or all of these settlements because they are "company specific" even though the source of the dispute is a statute applicable to all companies. Therefore, we recommend, at a minimum, the Board provide a scope exception for settlements with taxing or regulatory authorities. The scope exception would be in line with the spirit of the proposed standard while reducing the significant judgments needed to determine if the settlements are company specific.

In addition, we believe some of the disclosure requirements in this proposed standard are covered by existing accounting standards. For example, ASC 740 already includes significant disclosures about income tax expense including a reconciliation to the statutory tax rate. We think it would be appropriate for the Board to eliminate income taxes from the scope of this standard and, if needed, separately amend ASC 740 for any additional income tax related disclosures that are considered missing from the disclosure requirements.

We appreciate the opportunity to comment on the proposed changes. If you have any questions concerning our comments, please contact Bill Schneider (214) 757-3215.

Respectfully,

A handwritten signature in cursive script that reads "Debbie Dial".

Debbie Dial
Senior Vice-President & Controller