

Ameriprise Financial, Inc.
802 Ameriprise Financial Center
Minneapolis, MN 55474



Via Email: director@fasb.org

September 16, 2019

Mr. Shayne Kuhaneck
Acting Technical Director
File Reference No. 2019-760
Financial Accounting Standards Board
401 Merritt 7
Post Office Box 5116
Norwalk, CT 06856-5116

Re: File Reference: No. 2019-760, *Financial Services – Insurance (Topic 944) – Effective Date*

Dear Mr. Kuhaneck:

Ameriprise Financial, Inc., one of the nation’s leading financial planning, asset management and insurance companies, appreciates the opportunity to offer comments with respect to the Proposed Accounting Standards Update, *Financial Services – Insurance (Topic 944) – Effective Date* (the “Proposed ASU”).

In response to the Proposed ASU Question 1, we support the amendments in the Proposed ASU, specifically deferring the effective date of ASU 2018-12 for all entities. As the Board is aware, insurance entities have faced, and continue to face, many challenges implementing the targeted changes to insurance contract accounting. These challenges include system implementation, accounting interpretations and policy decisions, and stakeholder education. The additional one-year period afforded by the Proposed ASU will allow us to ensure our control environment is appropriate and operating effectively and our stakeholders are adequately educated about the effects of the accounting changes on our financial statements. In addition, the additional year is necessary to allow for appropriate interpretation of the accounting standards by us, the industry, and audit firms. We encourage the FASB to be diligent in monitoring the implementation efforts of the industry, including the pace at which audit firms and industry reach consensus on technical accounting interpretations. Should the pace of reaching consensus slow, the Board may need to revisit the effective date yet again.

In conclusion, the one year deferral is a welcome amendment and we appreciate the Board’s efforts and diligence in monitoring the implementation of ASU 2018-12.

Thank you for your consideration of our comments on these very important matters. If you have any questions or would like further information, please contact me at (612) 678-0057.

Sincerely,

A handwritten signature in black ink that reads "John R. Hutt".

John R. Hutt
Senior Vice President – Corporate Finance & Controller

Appendix – Responses to FASB’s Questions for Respondents

Question 1—Effective date for larger public companies. *Should the amendments in Update 2018-12 be effective for fiscal years, and interim periods within those fiscal years, beginning after December 15, 2021, for larger public companies (that is, SEC filers other than entities eligible to be SRCs as defined by the SEC)? If not, please explain why not.*

We agree with the proposed ASU requiring the effective date for larger public companies to be for fiscal years, and interim period within those fiscal years, beginning after December 15, 2021.

Should material interpretive accounting matters arise or the pace of achieving industry/accounting firm consensus on known technical interpretive matters slow, the FASB may need to reconsider the implementation period again.

Question 2—Effective date for entities other than larger public companies. *Should the amendments in Update 2018-12 be effective two years after the effective date for larger public companies for entities other than larger public companies (that is, for entities other than larger public companies, effective for fiscal years beginning after December 15, 2023)? If not, please explain why not.*

No comment.

Question 3—Interim periods for entities other than larger public companies. *Should the amendments in Update 2018-12 be effective for interim periods within the years after those amendments are effective for annual periods for entities other than larger public companies (that is, effective for interim periods within fiscal years beginning after December 15, 2024)? Or, alternatively, should the amendments in Update 2018-12 be effective for interim periods within the same fiscal year that the amendments in that Update are effective for annual periods (that is, effective for interim periods within fiscal years beginning after December 15, 2023)? Please explain why.*

No comment.

Question 4—Threshold. *Should the population of SEC filers that are afforded a delayed effective date be entities eligible to be SRCs as defined by the SEC? If not, what definitional threshold, if any, do you suggest and why?*

No comment.