



September 20, 2019

Technical Director  
Financial Accounting Standards Board  
401 Merritt 7  
P.O. box 5116  
Norwalk, CT 06856-5116

Via: [director@fasb.org](mailto:director@fasb.org)

**Re: File Reference No. 2019-760; FASB Exposure Draft (ED) - Proposed Accounting Standards Update: *Financial Services – Insurance (Topic 944) Effective Date***

Dear Mr. Kuhaneck:

The Allstate Corporation (Allstate) is pleased to provide comments to the Financial Accounting Standards Board (FASB) on its proposal to defer the effective date of Accounting Standards Update No. 2018-12, *Financial Services-Insurance (Topic 944): Targeted Improvements to the Accounting for Long-Duration Contracts* (ASU).

Allstate is one of the largest U.S. publicly held personal lines insurers and a significant provider of life insurance products. We support FASB's proposal to amend and extend the effective date of the ASU to be effective for fiscal years and interim periods within those fiscal years beginning after December 15, 2021 for larger public companies.

We would also like to acknowledge our appreciation for the extensive outreach conducted by the Board and staff in evaluating the request to defer the effective date of the ASU. We align with the benefits of deferral articulated in paragraphs BC 9 and BC 10 of the ED.

Thank you for your time and attention to this important topic and for the opportunity to comment on the ED. Feel free to contact us with any questions or for additional information.

John Pintozzi  
Senior Vice President, Controller and Chief  
Accounting Officer  
Phone: (847) 402-9281

Kevin Spataro  
Senior Vice President – Accounting Policy  
and Research  
Phone: (847) 402-0929

CC: Ken Marcotte, Vice President – Financial Reporting

**The Allstate Corporation**  
3075 Sanders Road  
Northbrook, Illinois 60062