



Invesco Ltd.
Two Peachtree Pointe
1555 Peachtree Street, N.E.
Atlanta, GA 30309

Telephone: +1 404 479 1095

September 17, 2010

Mr. Russell G. Golden
Technical Director
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

**Proposed Accounting Standards Update, “Contingencies (Topic 450): Disclosure of Certain Loss Contingencies”
(File Reference No. 1840-100)**

Dear Mr. Golden:

This letter sets forth the comments of Invesco Ltd. (“Invesco,” or the “Company”) on the Proposed Accounting Standards Update, “Contingencies (Topic 450): Disclosure of Certain Loss Contingencies,” (the “Proposed ASU”).

Invesco is a global independent investment management company delivering investment management capabilities through a comprehensive array of investment products and solutions for retail, institutional and high-net-worth clients. Operating in 22 countries, Invesco had \$573.8 billion in assets under management as of August 31, 2010. The Company provides investment management services to, and has transactions with, various mutual funds, private equity funds, real estate funds, fund-of-funds, collateralized loan obligations, separate institutional accounts, and other investment products sponsored by the company for the investment of client assets in the normal course of business.

The Company believes that the current disclosure requirements in ASC Topic 450 are appropriate and properly serve to provide transparency while preserving judicially sensitive information. We therefore do not believe that the Board should move forward with finalizing the Proposed ASU. The amendments outlined in the Proposed ASU are operationally burdensome, while providing little substantive information, and they are prejudicial in nature. Our comments are explained further below.

Disclosure of Remote Loss Contingencies

The Company believes that disclosure of remote loss contingencies will not add any additional meaningful information to readers of its financial statements but will instead add confusion and result in unnecessary additional disclosures of claims or contingencies that the Company does not consider likely to occur. Additionally, such disclosure would be prejudicial and potentially disadvantageous to the Company in terms of revealing to plaintiffs the Company’s view on the severity of certain remote loss contingencies. Disclosure should be limited to items that are probable or reasonably possible of occurring.

Tabular Reconciliation of Accruals

We believe that current guidance regarding disclosure of accruals in ASC Topic 450 is appropriate and that a tabular reconciliation of loss contingency accruals should not be required. ASC Topic 450-20-50-1 requires disclosure of accruals when “necessary for the financial statements not to be misleading.” This requirement preserves the prejudicial nature of establishing an accrual. Tabular reconciliation, especially on a disaggregated basis, by contrast, may unnecessarily identify the Company’s estimates, and changes in those estimates from period-to-period, of the outcomes of certain loss contingencies – information which may be used to the Company’s disadvantage by plaintiffs.

Prejudicial Exemption

If the Board does not eliminate the requirements to disclose certain remote loss contingencies and the requirement to provide a tabular reconciliation of accrued loss contingencies, the Board should allow complete aggregation of disclosures and establish a prejudicial exemption for these disclosure requirements to prohibit confidential assessments of costs to be inappropriately assessable to the Company’s adversaries. Such a prejudicial exemption should be applied in connection with the Company’s counsel’s opinion that disclosure would be prejudicial, unless failure to make such a disclosure would be misleading to the financial statements.

Effective Date

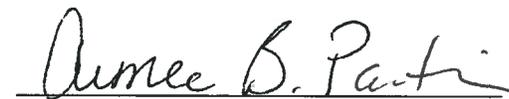
We believe that, should the Board move forward with a final standard, the effective date should be delayed by one year, no earlier than fiscal years ending after December 15, 2011, for public companies. The Proposed ASU will require companies to put in place extensive and detailed processes for capturing data regarding potential remote loss contingencies to comply with internal control rules and regulations pertaining to financial reporting. Decision frameworks will need to be put into place to allow companies to properly assess the amount of data to potentially disclose, and policies will need to be established to evaluate remote loss contingencies, even if they result in no additional disclosure. With the comment period on the Proposed ASU ending September 20, 2010, a final standard would potentially be issued in the fourth quarter of 2010, to be implemented in the 2010 Form 10-Ks of calendar-year public companies. This potential timeline does not provide sufficient opportunity to establish a robust financial reporting process around disclosure of loss contingencies for Forms 10-K for the period ending December 31, 2010.

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We would be pleased to discuss our comments with the Board or its staff.

Very truly yours,


David A. Hartley
Group Controller and Chief Accounting Officer


Aimee B. Partin
Head of Regulatory Reporting