VIA Electronic Mail (director@fasb.org)

November 23, 2010

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

File Reference: No. 1880-100

Dear Board Members and FASB Staff:

The Mortgage Bankers Association[1] (MBA) will be sending a more comprehensive comment letter on the Proposed Accounting Standards Update, *Receivables, Clarifications to Accounting for Troubled Debt Restructurings* (TDRs) (Proposed Update) in several weeks. In consideration of the timing of the Proposed Update comment and review period, MBA requests that FASB consider delaying the new TDR-related disclosures in the Accounting Standards Update No. 2010-20, *Disclosures about the Credit Quality of Financing Receivables and the Allowance for Credit Losses* (ASU 2010-20) until FASB has completed its due diligence on the Proposed Update and issued any new guidance.

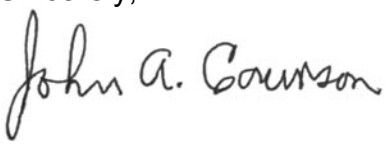
ASU 2010-20 will require significant new disclosures with respect to TDRs. For public entities, the new disclosures are effective for interim and annual reporting periods ending on or after December 15, 2010. Disclosures about activity occurring during a reporting period are effective for interim and annual reporting periods beginning on or after December 15, 2010. These effective dates occur before the proposed effective date of the Proposed Update which possibly changes the definition of a TDR.

[1] The Mortgage Bankers Association (MBA) is the national association representing the real estate finance industry, an industry that employs more than 280,000 people in virtually every community in the country. Headquartered in Washington, D.C., the association works to ensure the continued strength of the nation's residential and commercial real estate markets; to expand homeownership and extend access to affordable housing to all Americans. MBA promotes fair and ethical lending practices and fosters professional excellence among real estate finance employees through a wide range of educational programs and a variety of publications. Its membership of over 2,200 companies includes all elements of real estate finance: mortgage companies, mortgage brokers, commercial banks, thrifts, Wall Street conduits, life insurance companies and others in the mortgage lending field. For additional information, visit MBA's Web site: www.mortgagebankers.org.

MBA believes that any new disclosures of TDRs under ASU 2010-20 should be presented after the effective date of the Proposed Update to avoid confusion with respect to the definition of a TDR.

Any questions about MBA's comments should be directed to Jim Gross, Associate Vice President and Staff Representative to MBA's Financial Management Committee, at (202) 557-2860 or jgross@mortgagebankers.org.

Sincerely,



John A. Courson
President and Chief Executive Officer