



November 25, 2011

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

File Reference No. 2011-240

Via email: director@fasb.org

Re: *Statement of Comprehensive Income (Topic 220)* - Proposed Accounting Standards Update, "Deferral of Effective Date for Amendments to the Presentation of Reclassifications of Items Out of Accumulated Other Comprehensive Income in Accounting Standards Update No. 2011-05" (hereinafter referred to as the "Proposal").

Dear Ladies and Gentlemen:

On behalf of salesforce.com, inc. (the Company'), we appreciate the opportunity to share our views on the Proposal. The Company supports the Proposal to defer the effective date for the requirement to present on the face of the financial statements reclassification adjustments for each component of accumulated other comprehensive income ("AOCI").

In our view though, we believe that deferral should be permanent. Absent a permanent deferral, we believe that the requirement should be mandated only for annual reporting, not both annual and interim reporting.

If a permanent deferral is not granted we believe that companies should be allowed to present such reclassification adjustments in its footnote disclosures. Given that comprehensive income is not one of our key performance measures, we would, if permitted, choose to present the reclassification adjustments in our footnotes. Additionally, we believe because it is not relevant to our investors, we would, if allowed, report such adjustments in our annual report on Form 10-K.

### **Overview of salesforce.com**

Salesforce.com, inc. is a leading provider of enterprise cloud computing applications. The Company was incorporated in February 1999 and provides a comprehensive customer and collaboration relationship management service to businesses of all sizes and industries worldwide, and provides a technology platform for customers and developers to build and run business applications.



The Company's stock is listed on the New York Stock Exchange and the Company's stock is included in the Standard & Poor 500 Index. The Company's market capitalization places it within the 200 most valuable companies in the Standard & Poor 500 Index.

**Detailed discussion of our views**

Question 1: Do you agree with the deferral? Why or why not?

The Company is advocating a *permanent* deferral of the requirement to present on the face of its financial statements reclassifications of AOCI. We believe that the adjustments will create equal or more prominence with other more important measures of financial performance, and thus be distracting and confusing to investors.

Based on our interaction with our investment community, which comprises of 44 analysts and more than 100 institutional shareholders, we believe that analysts and investors do not use AOCI as a key measure to monitor performance. Instead current operating performance measures such as revenue, gross profit and operating margins, diluted earnings per share, deferred revenue, and cash flow are used. We therefore believe that the presentation that is required will confuse rather than benefit the users of our financial statements.

We note that the proposal also contains updates to interim reporting requirements. We do not believe that this is necessary as in our view, reclassification adjustments out of AOCI are not a key performance measure. Additionally, we note the provisions of Para - ASC 220-10-45-18 is ambiguous with respect to the level of detail required for interim financial statements.

Question 2:

Are there alternatives that the Board should consider for presenting reclassifications out of accumulated other comprehensive income that would be more cost effective than the one required by Update 2001-05?

Question 3: If you provide an alternative in Question 2 above, please explain how your alternative would better serve the needs of users in the financial statements than the current requirements.

If a permanent deferral is not granted, we believe that the reclassifications out of accumulated other comprehensive income should be disclosed in the footnotes to the financial statements

Thank you for your consideration of our views. We welcome the opportunity to discuss any and all related matters. I can be contacted at (415) 901-7000.

Sincerely,

/s/ Joseph C. Allanson

Joseph C. Allanson  
SVP, Chief Accountant and Controller  
salesforce.com, Inc.