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October 9, 2012

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

File Reference No. 2012-240

Re: Proposed Accounting Standards Update, *Presentation of Items Reclassified Out of Accumulated Other Comprehensive Income*

Dear Ms. Cospers:

Deloitte & Touche LLP is pleased to comment on the FASB's proposed ASU *Presentation of Items Reclassified Out of Accumulated Other Comprehensive Income*.

We support the issuance of the proposal as a final ASU because we think that it will provide financial statement users with meaningful information about how reclassifications out of accumulated other comprehensive income (AOCI) affect a reporting entity's net income without obfuscating the face of a reporting entity's financial statements. We do, however, believe that before issuing as a final standard, the Board should modify the proposed ASU by (1) permitting entities to omit disclosures required by other Codification topics when they would be redundant with the disclosures required by the proposal and (2) changing the effective date of the proposal to fiscal years (and reporting periods within those fiscal years) beginning after December 15, 2012.

The appendix of this letter contains responses to the proposed ASU's Questions for Respondents.

We appreciate the opportunity to comment on the proposed ASU. If you have any questions concerning our comments, please contact Stuart Moss at (203) 761-3042.

Yours truly,

Deloitte & Touche LLP

cc: Robert Uhl

Appendix
Deloitte & Touche LLP
Responses to Questions for Respondents

Question 1: Would the proposed disclosures provide useful information to users of financial statements?

Yes, we believe that the proposed disclosures will provide financial statement users with meaningful information about how reclassifications out of AOCI affect a reporting entity's net income without obfuscating the face of a reporting entity's financial statements. Specifically, we support the proposed ASU's requirements for reporting entities to provide information about (1) all reclassifications in the same disclosure and (2) other financial statement items affected by such reclassifications by cross-referencing their footnotes to the relevant disclosure requirements under the proposed ASU, thereby creating a "roadmap" for users. We believe users benefit from such cohesion, and we encourage the Board to continue such efforts in future and ongoing projects.

Question 2: Would an entity incur significant costs because of the proposed amendments? Would an entity incur significant costs because of the proposed requirement for interim-period disclosures?

The proposed ASU's disclosure requirements may be redundant with existing disclosure requirements in other Codification topics. Because disclosure redundancies place a burden on both preparers and users, the Board should try to eliminate any disclosure redundancies that result from compliance with the proposed requirements. That is, reporting entities should have to comply with the new disclosure requirements but should be permitted to omit redundant disclosures and cross-reference to the new disclosure requirements when appropriate. For example, in the context of derivative instruments designated in cash flow hedging relationships, the proposed disclosure of reclassification items and their impact on net income will provide information identical to that required by ASC 815-10-50-4C(c). In this case, we believe preparers should be required to provide the new reclassification disclosure but permitted to omit the redundant ASC 815 disclosure as long as they link their derivatives disclosure footnote to the AOCI reclassification disclosure in accordance with ASC 815-10-50-4I.

Regarding the proposed ASU's requirement to provide disclosures for interim periods, we encourage the Board to weigh the extent to which financial statement users need such information against the generally condensed nature of interim-period financial statements. Feedback received from users and preparers during the comment period will be important to this assessment.

Question 3: Should any of the proposed amendments be different for nonpublic entities?

We believe that the proposed amendments should apply to both public and nonpublic entities.

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Question 4: The Board had discussed the possibility of making the proposed amendments effective for public entities as early as for annual reporting periods ending after December 15, 2012, and to delay the effective date for nonpublic entities by one year. Would those effective dates be practicable? If not, please explain why.

We recommend that the Board change the proposed ASU's effective date for public companies to fiscal years (and reporting periods within those fiscal years) beginning after December 15, 2012. Under the current proposal, calendar-year public companies would be required to apply the standard in preparing their December 31, 2012, financial statements and thus would have very little time from the date a final ASU is issued to adjust their processes and present their disclosures. We believe both users and preparers will benefit from a delay in the effective date because preparers would have more time to prepare cohesive disclosures about the reclassification of items out of AOCI.