

JPMORGAN CHASE & CO.

Bret Dooley
Managing Director
Corporate Accounting Policies

December 21, 2012

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

File Reference No. 2012-250: Proposed Accounting Standards Update: *Clarifying the Scope of Disclosures about Offsetting Assets and Liabilities (the "Proposed ASU")*

Dear Ms. Cospers:

JPMorgan Chase & Co ("JPMorgan Chase" or "the Firm") appreciates the opportunity to comment on the Exposure Draft, *Clarifying the Scope of Disclosures about Offsetting Assets and Liabilities*, issued by the Financial Accounting Standards Board ("FASB"). JPMorgan Chase commends the FASB's actions to address scope issues that have arisen during the implementation of Accounting Standards Update No. 2011-11. Subject to further clarifying the scope for derivative instruments, we believe that the Proposed ASU effectively addresses those implementation issues and eases rather than introduces operability concerns. Further, we do not believe that there are other instruments that should be included in the proposed scope that would be useful to reconciling financial statements prepared in accordance with U.S. GAAP and those prepared in accordance with IFRS.

With respect to derivative instruments, the revised scope refers to the definition in the Codification's master glossary, which states that Paragraphs 815-10-15-83 through 15-139 of the Topic 815 define the term derivative instrument. However, the referenced paragraphs do not include the Topic 815 scope exceptions. Instruments that meet the definition of a derivative but are not subject to the requirements of Topic 815 as a result of meeting one of the scope exceptions have not been interpreted to qualify for the offsetting guidance in Topic 815-10-45. Therefore, we suggest the scope of the offsetting disclosures be limited to derivative instruments accounted for as freestanding derivative instruments.

We appreciate the opportunity to submit our views and would be pleased to discuss our comments with you at your convenience. If you have any questions, please contact me at 212.648.0404.

Sincerely yours,



Bret Dooley