January 2, 2013

To: Technical Director
Financial Accounting Standards Board
401 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116
Via Email: director@fasb.org

Re: Proposed Accounting Standards Update—Balance Sheet (Topic 210): Clarifying the Scope of Disclosures about Offsetting Assets and Liabilities
File Reference No. 2012-250

Thank you for the opportunity to comment on the Proposed Accounting Standards Update *Balance Sheet (Topic 210): Clarifying the Scope of Disclosures about Offsetting Assets and Liabilities* ("Proposed ASU").

I work in an external reporting function at a publicly traded technology company. The views presented below are my own and do not necessarily represent those of my employer or any of my colleagues.

I thank the Board for reconsidering the scope of Accounting Standards Update 2011-11 ("ASU 2011-11"). While I believe it is in the best interests of many different types of stakeholders to wait until a decision is made on the Disclosure Framework project before implementing new disclosure requirements, I believe the narrowed scope of the Proposed ASU results in a disclosure requirement that is more reasonable for preparers.

I understand that the Proposed ASU would limit the scope of the disclosure requirements in ASU 2011-11 to recognized derivative instruments, repurchase agreements and reverse repurchase agreements, and securities borrowing and securities lending transactions that are offset in accordance with either Section 210-20-45 or Section 815-10-45, or that are subject to an enforceable master netting arrangement or similar agreement.

This revised scope in the Proposed ASU does appear to exclude an entity's trade receivables and trade payables, but it is not entirely clear that the revised scope excludes trade receivables that are transferred to a third party as a part of a secured borrowing (such transaction hereinafter referred to as "Receivables Securitizations"). Given that the Board appeared to undertake the Proposed ASU to specifically exclude trade receivables and payables from the scope of ASU 2011-11, I respectfully suggest that the scope of the Proposed ASU be modified to exclude Receivables Securitizations. As of the time of this letter, the definitions of "repurchase agreement" in the Master Glossary appear to include only "securities" that are transferred in a transaction. Any broadening of these definitions, however, to include "financial instruments" more generally could result in Receivables Securitizations being within the scope of the Proposed ASU.

Further, I believe the definition of "repurchase agreement" in the Master Glossary could be enhanced to specify not only the instrument that is the subject of the agreement, but also whether the agreement to repurchase is an obligation versus a unilateral right or conditional right. I believe that agreements that give a party a unilateral or conditional right to repurchase would not necessarily constitute a liability, and presumably were not intended to be within the scope of the Proposed ASU.

Respectfully submitted,

Rick Snow, CPA