

December 14, 2010

Technical Director
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116
Via email: director@fasb.org

File Reference No. 1900-200: Deferral of the Effective Date of Disclosures about Troubled Debt Restructurings in Update No. 2010-20

Dear Technical Director:

The American Bankers Association (ABA) appreciates the opportunity to comment on the exposure draft *Deferral of the Effective Date of Disclosures about Troubled Debt Restructurings in Update No. 2010-20* (ED). ABA brings together banks of all sizes and charters into one association. ABA works to enhance the competitiveness of the nation's banking industry and strengthen America's economy and communities. Its members – the majority of which are banks with less than \$125 million in assets – represent over 95 percent of the industry's \$12.7 trillion in assets and employ over 2 million men and women.

ABA supports FASB's proposal to defer the effective date for information related to troubled debt restructurings (TDRs) that are required to be disclosed per the recently-issued Accounting Standards Update (ASU) 2010-20 *Receivables (Topic 310): Disclosures about the Credit Quality of Financing Receivables and the Allowance for Credit Losses*. Bankers are concerned that a final ASU related to the exposure draft *Clarifications to Accounting for Troubled Debt Restructurings by Creditors* (TDR ED) will change their disclosures related to TDRs. Therefore, we agree that deferring the TDR disclosure requirements in 2010-20 is appropriate until those changes, if any, are known. Based on the changes proposed in the TDR ED, the amounts could, in certain circumstances, significantly change and the related internal controls could require considerable revision. In other words, a lot of work might be performed for a one-time disclosure that, due to the potential changes, ends up being disregarded thereafter.

Thank you for your attention to these matters. Please feel free to contact me (mgullette@aba.com; 202-663-4986) if you would like to discuss this.

Sincerely,



Michael L. Gullette