

Question 2: *Should the proposed guidance be applied on a prospective basis?*

We agree with the Board's proposal to apply the guidance on a prospective basis. However, additional work required to apply the guidance on a retrospective basis would be minimal and worth the benefit of improved comparability across fiscal years for us. Therefore, we would be supportive of an election to adopt retrospectively.

Question 3: *Should the amendments in this proposed Update be effective for:*

a. Public business entities for annual periods, including interim periods within those annual periods, beginning after December 15, 2016

b. All other entities for annual periods beginning after December 15, 2017, and interim periods in annual periods beginning after December 15, 2018, with early adoption permitted, but not before the effective date for public business entities?

We agree with the effective dates proposed in the amendment, however, we believe that early adoption should be permitted. As we expect the adoption of this guidance should simplify the presentation of deferred tax assets and liabilities and enhance a user's understanding of a company's financial position, we believe companies should be permitted to apply the guidance as soon as they are able to do so, provided that disclosure is made of the early adoption.

Question 4: *What would be the expected transition costs of adopting the guidance in the proposed Update? What would be the expected recurring costs of applying the proposed guidance compared with the costs of applying current GAAP?*

We do not expect to incur significant transition costs to adopt this proposed guidance and also expect the costs of applying the proposed guidance to be less than the costs of applying current GAAP.

If you have any questions regarding our response, or would like to discuss our comments further, please call me at (703) 948-4493.

Sincerely,

VERISIGN, INC.

/s/ John D. Calys

John D. Calys
Vice President, Global Controller