

Ameriprise Financial, Inc.
802 Ameriprise Financial Center
Minneapolis, MN 55474



Via Email: director@fasb.org

January 21, 2016

Ms. Susan M. Cospers
Technical Director
File Reference No. 2015-330
Financial Accounting Standards Board
401 Merritt 7
Post Office Box 5116
Norwalk, Connecticut 06856-5116

Re: File Reference: No. 2015-330, *Business Combinations (Topic 805) – Clarifying the Definition of a Business*

Dear Ms. Cospers:

Ameriprise Financial, Inc., one of the nation's leading financial planning, asset management and insurance companies, appreciates the opportunity to offer comments with respect to the Proposed Accounting Standards Update, *Business Combinations (Topic 805) – Clarifying the Definition of a Business* (the "Proposed ASU").

We support the FASB's efforts to clarify accounting standards with the objective of adding guidance to assist entities with accounting for transactions as acquisitions of assets or businesses. We believe the proposed changes, including the prospective transition, would achieve FASB's clarification objective with a neutral impact to cost and complexity when applying the accounting standards.

However, we do not support the phased approach to standard setting in the area of business combinations and asset acquisitions referred to on page two of the Proposed ASU whereby the definition of a business is clarified in one phase and the differences in the acquisition and derecognition guidance for assets and businesses is addressed in another phase. Stakeholders should be given the ability to comment after careful consideration of the guidance in its entirety.

We do not support the issuance of a final accounting standard prior to the FASB addressing differences in asset acquisition and business combination guidance. Specifically, the FASB should consider preparer and user feedback on the following areas: accounting for contingent consideration; the treatment of direct acquisition-related costs; initial measurement and allocation of purchase price; and recognition of bargain purchase options. It is imperative that a final accounting standard be

comprehensive and consider all aspects of accounting for asset acquisitions and business combinations. Aligning such differences may remove the need for the FASB to provide this additional guidance and clarity when determining whether a transaction is classified as a business combination or asset acquisition.

In conclusion, we ask the FASB to table the final standard to clarify the definition of a business until the Board has completed its due process in evaluating differences in the existing guidance for asset acquisitions and business combinations.

Thank you for your consideration of our comments on these very important matters. If you have any questions, comments or would like further information, please contact me at (612) 678-4769.

Sincerely,

A handwritten signature in black ink, appearing to read "David K. Stewart". The signature is written in a cursive, flowing style.

David K. Stewart
Senior Vice President & Controller