

From: George Struve [mailto:gstruve@mchcpa.net]
Sent: Thursday, August 24, 2017 2:54 PM
To: Director - FASB <director@fasb.org>
Subject: Comment on Proposed Technical Corrections and Improvements to Topic 942

Dear FASB Members:

Paragraphs BC4 and BC5 do not consider that small banks and thrifts (total assets under \$500 million) are still eligible to use the reserve method of accounting for bad debts for income tax purposes. Accordingly, the post-1987 bad debt reserves of such thrifts were not fully recaptured by 2008 and have not yet been fully recaptured. The stated basis for the change in BC5 does not apply for such thrifts. Subtopic 942-740-35-2 is relevant for small thrifts.

Regards,

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