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August 24, 2017

Ms. Susan M. Cospers  
Technical Director  
Financial Accounting Standards Board  
401 Merritt 7  
P.O. Box 5116  
Norwalk, CT 06856-5116

**File Reference No. 2017-250**

**Re: Proposed Accounting Standards Update, *Technical Corrections and Improvements to Topic 995, U.S. Steamship Entities***

Dear Ms. Cospers:

Deloitte & Touche LLP is pleased to comment on the FASB's proposed Accounting Standards Update (ASU) *Technical Corrections and Improvements to Topic 995, U.S. Steamship Entities*.

We support the Board's commitment to a standing project focused on technical corrections, clarifications, and minor improvements to the *FASB Accounting Standards Codification* (the "Codification"). Limiting this project to minor changes that do not significantly affect current practice is the most practical and efficient way to resolve technical issues related to the Codification.

We generally agree with, and support finalizing, the proposed technical corrections. The appendix contains our responses to the proposed ASU's questions for respondents.

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We appreciate the opportunity to comment on the proposed ASU. If you have any questions concerning our comments, please contact Matt Himmelman at (714) 436-7277.

Yours truly,

Deloitte & Touche LLP

cc: Bob Uhl

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**Appendix**  
**Deloitte & Touche LLP**  
**Responses to Proposed ASU's Questions for Respondents**

*Question 1: Do you agree that the guidance in Topic 995 is no longer relevant and should be superseded?*

We agree that the guidance in ASC 995 is no longer relevant and should be superseded.

*Question 2: Do you agree that all entities that may have unrecognized deferred taxes related to statutory reserve deposits made on or before December 15, 1992, should recognize those deferred taxes in accordance with Topic 740 if they are not already doing so? If not, why not?*

We agree that all entities that may have unrecognized deferred taxes related to statutory reserve deposits made on or before December 15, 1992, should recognize those deferred taxes in accordance with ASC 740 if they are not already doing so.

*Question 3: The amendments in this proposed Update would require an entity that is required to recognize previously unrecognized deferred income taxes as a result of the proposed amendments to disclose the types of temporary differences for which a deferred tax liability had not previously been recognized. Do you agree with this disclosure? If not, why not?*

We agree with the amendments in this proposed ASU that would require an entity that is required to recognize previously unrecognized deferred income taxes as a result of the proposed amendments to disclose the types of temporary differences for which a deferred tax liability had not previously been recognized.

*Question 4: Should the Board require all entities with statutory reserves made on or before December 15, 1992, to adopt the proposed amendments upon issuance of the final Update? If not, why not?*

We do not believe that the Board should require all entities with statutory reserves made on or before December 15, 1992, to adopt the proposed amendments upon issuance of the final ASU. Rather, we believe that the Board should require adoption of the proposed amendments at some date after issuance of the final ASU (e.g., effective for periods (including interim periods) beginning after issuance) to allow affected entities, if any, to learn about the final issuance and make the required changes.