



Deloitte & Touche LLP
695 East Main Street
Stamford, CT 06901-2141

Tel: + 1 203 708 4000
Fax: + 1 203 708 4797
www.deloitte.com

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. 2017-260

Re: Proposed Accounting Standards Update, *Technical Corrections and Improvements to Topic 942, Financial Services — Depository and Lending: Elimination of Certain Guidance for Bad Debt Reserves of Savings and Loans*

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 942, Financial Services — Depository and Lending: Elimination of Certain Guidance for Bad Debt Reserves of Savings and Loans*.

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 practices is the most practical and efficient way to resolve technical issues related to the Codification.

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

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

File Reference No. 2017-260
August 24, 2017
Page 2

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

Question 1: Do you agree that the guidance in Subtopic 942-740 for bad debt reserves of savings and loans (and other qualified thrift lenders) that arose after December 31, 1987, is no longer relevant and should be superseded from the Codification? If not, why not?

We agree that the guidance in ASC 942-740 on bad debt reserves of savings and loans (and other qualified thrift lenders) that arose after December 31, 1987, is no longer relevant and should be superseded from the Codification.

Question 2: Do you agree that the guidance related to Circular 202 on the accounting for net deferred tax charges is no longer relevant and should be superseded from the Codification? If not, why not?

We agree that the guidance related to Circular 202 on the accounting for net deferred tax charges is no longer relevant and should be superseded from the Codification.