



August 28, 2017

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

RSM US LLP
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Chicago, IL 60606
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File Reference No. 2017-260

Dear Ms. Cospers:

RSM US LLP is pleased to provide feedback on the proposed Accounting Standards Update, *Elimination of Certain Guidance for Bad Debt Reserves of Savings and Loans* (the “proposed ASU”). Responses to the specific questions raised in the proposed ASU follow.

Responses to 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and loans (and other qualified thrift lenders) that arose after December 31, 1987, is no longer relevant and should be superseded from the Codification?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?*

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the guidance related to Circular 202 on the accounting for net deferred tax charges is no longer relevant and should be superseded from the Codification?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?*

Response to Questions 1 and 2: We agree that this guidance is no longer relevant and should be superseded from the Codification.

We appreciate this opportunity to provide feedback on the proposed ASU and would be pleased to respond to any questions the Board or its staff may have concerning our comments. Please direct any questions to Rick Day at 563.888.4017 or Mike Lundberg at 612.455.9488.

Sincerely,

RSM US LLP

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