

02/02/2018

Record ID: 636528507853986334

Question Text	Response	Status
* Please select the type of entity or individual responding to this feedback form.	Preparer	Completed
Other, please specify (Specified)		
* Please provide contact information for any follow-up questions.	(Filled in as Follows:)	Completed
Organization *	FPI	
First name *	Scott	
Middle initial		
Last name *	Rousseau	
Email address *	scott.rousseau@financialpartners.com	
Phone number	4132378420	
1. Do you agree with the amendments in this proposed Update that would require a reclassification from accumulated other comprehensive income to retained earnings for stranded tax effects resulting from the newly enacted federal corporate income tax rate? If not, why?	Yes	Completed
2. Are the transition requirements appropriate? If not, what transition approach is more	Yes	Completed

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<p>appropriate and why?</p>		
<p>3. Do you agree that early adoption should be permitted?</p>	<p>Yes</p>	<p>Completed</p>
<p>4. Do you agree with the proposed effective date? If not, what effective date is more appropriate and why?</p>	<p>Yes</p>	<p>Completed</p>
<p>5. GAAP generally prohibits backwards tracing, which is the process of recognizing the effects of changes in deferred tax amounts in the current year in the same line item in which the deferred tax amounts were originally recognized (for example, other comprehensive income) in prior years. The Board did not allow backwards tracing as part of this project and is currently researching the merits of a broader project on backwards tracing. Should the Board</p>	<p>Yes, without backwards tracing in the case of the DTA revaluation there is inconsistency in accounting treatment between the original establishment of the DTA's, which do not impact the provision and the subsequent revaluation of the DTA's which does impact the provision.</p>	<p>Completed</p>

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<p>add a broader project on backwards tracing to its active agenda? If so, why? Additionally, should the following alternatives to backwards tracing be considered in that broader project? If so, why?</p> <p>Accounting for the release of the stranded tax effects from accumulated other comprehensive income</p> <p>Reclassification from accumulated other comprehensive income to retained earnings for stranded tax effects associated with prior changes in other tax rates (for example, state and local taxes)</p> <p>Reclassification from accumulated other comprehensive income to retained earnings for stranded tax effects associated with all future changes in tax rates.</p>		
<p>Please provide any additional comments on the Proposed Update:</p>	<p>Could the FASB comment on the impact of this proposed change on equity method accounting when an investee will have a direct adjustment to retained earnings that does not flow through the statement of income? Specifically, when an investor is accounting for its share of the investee's results for the year, does the investor include the proposed direct adjustment to retained earnings in the basis for its share of the investee's financial results for the year?</p>	<p>Completed</p>
<p>Please provide any comments on</p>		<p>Completed</p>

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the electronic feedback process:		
Below is a summary of your responses to the questions in this feedback form:	Not Answered	Not Answered
Thank you for your participation. If you are finished providing comments, click the 'Submit' button.	Not Answered	Not Answered