



February 2, 2018

Technical Director  
Financial Accounting Standards Board  
401 Merritt 7  
PO Box 5116  
Norwalk, CT 06856-5116

File Reference No. 2018-200: Leases (Topic 842): Targeted Improvements (Proposed ASU)

Dear FASB Board Members and Staff:

The PNC Financial Services Group, Inc. ("PNC" or "we") appreciates the opportunity to comment on the Proposed ASU which has been issued by the Financial Accounting Standards Board ("the Board") to address implementation issues raised by stakeholders regarding the implementation of Topic 842. We applaud the Board's efforts to expeditiously address these implementation issues.

PNC fully supports the new transition option in the Proposed ASU that would allow entities to use the effective date of Topic 842 as the date of initial application. This decision will reduce the cost and complexity of implementing Topic 842 without reducing the usefulness of information presented to financial statement users. We believe the current disclosure requirements under Topic 840 provide sufficient information to allow financial statement users to identify future lease obligations not presented on the balance sheet for comparative periods presented. In addition, we support the addition of a practical expedient for lessors to not separate lease and non-lease components in a contract.

We appreciate the opportunity to share our views with the Board. We welcome any questions or comments you may have on this letter. Please contact me (412.762.1622) with any questions about PNC's comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Lauren Belot". The signature is written in a cursive style with a large, stylized initial "L".

Ms. Lauren Belot  
Director of Accounting Policy  
The PNC Financial Services Group, Inc.

cc: Mr. John (JJ) Matthews  
Director of Finance Governance & SEC Reporting  
The PNC Financial Services Group, Inc.

Mr. Gregory H. Kozich  
Senior Vice President and Corporate Controller  
The PNC Financial Services Group, Inc.