



Texas Instruments Incorporated

February 2, 2018

Technical Director
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, Connecticut 06856-5116

Re: File Reference No. 2018-200, Exposure Draft: Leases (Topic 842), Targeted Improvements

Dear Technical Director:

Texas Instruments Incorporated (“TI”) appreciates the opportunity to comment on the proposed Accounting Standards Update (ASU): *Leases (Topic 842), Targeted Improvements* (the “Exposure Draft”). TI is a global semiconductor design and manufacturing company that develops analog ICs and embedded processors.

We commend the FASB for issuing the proposed ASU in response to stakeholder concerns, and we encourage the Board to continue considering additional expedients that may provide transition relief for preparers without sacrificing useful decision-making information for users.

We fully support the proposed changes to the guidance related to the optional transition method. We believe these changes will reduce the cost and complexity of the transition, and the proposed transition method, as written in the Exposure Draft, is operable. In addition, we agree with the FASB that this additional transition method will only change when preparers are required to initially apply the transition requirements of the new lease standard; it would not change how those requirements apply.

We are committed to the successful adoption and implementation of ASC 842, and we appreciate the opportunity to present our comments to the Board. If you have any questions regarding this letter, please contact Jared White, Director of Technical Accounting, at (214) 479-8051.

Sincerely,

A handwritten signature in black ink, appearing to read 'Stephane Calatayud', written over a horizontal line.

Stephane Calatayud
Vice President and Controller