



2 Court Square, 15th floor
Long Island City, NY 11101

March 29, 2018

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

File Reference No. 2018-220

Dear Ms. Cospers:

Citigroup appreciates the opportunity to comment on the proposed Accounting Standards Update (“Exposure Draft”), *Derivatives and Hedging (Topic 815) – Inclusion of the Overnight Index Swap (OIS) Rate Based on the Secured Overnight Financing Rate (SOFR) as a Benchmark Interest Rate for Hedge Accounting Purposes*.

As a member of the Alternative Reference Rate Committee (ARRC), convened by the Federal Reserve Board, we have been involved in the effort to identify a widely-used alternative to LIBOR. As a member of the ARRC and a market maker, we believe it is important to facilitate the market’s replacement of LIBOR in a smooth transition.

We participated in the International Swaps and Derivatives Association’s (ISDA) North America Accounting Committee letter and are supportive of the comments made therein. We ask the Board to consider ISDA’s recommendations to the Exposure Draft.

We would be pleased to discuss our comments with you at your convenience. Please feel free to call me at (347) 648-7721.

Sincerely,

A handwritten signature in blue ink that reads "Robert Traficanti". The signature is written in a cursive, flowing style.

Robert Traficanti
Global Head of Accounting Policy