

07/19/2019

Record ID: 636985438290049293

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 *	Boeing Employees' Credit Union	
First name *	Tracy	
Middle initial		
Last name *	Ball	
Email address *	tracy.ball@becu.org	
Phone number		
Should other changes be made that are directly or indirectly related to amendments in this proposed Update? Please note that the Board will conduct Codification improvement projects on a periodic basis and additional changes may be postponed to a subsequent Codification improvement project.		Completed
The proposed amendments would apply to public and nonpublic entities. Would any of the proposed amendments require special consideration for nonpublic entities?		Completed

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<p>If so, which proposed amendment(s) would require special consideration and why?</p>		
<p>Should an entity be permitted to record a negative allowance (basis recovery) when measuring the allowance for credit losses for purchased financial assets with credit deterioration?</p>	<p>Yes. However, I request that the board also clarify the applicability of proposed paragraph 326-20-30-13A to other assets accounted for at amortized cost. The requirement to defer origination fees and costs directly attributable to the origination of a loan under ASC 310-20 will require practitioners to evaluate whether this paragraph should be applied to such amounts. While it seems clear that by virtue of the board's intent to avoid creating guidance on how an entity should reestablish a discount or interest income recognition after a non-accrual asset starts performing in BC8, this paragraph should be applied to all instruments for which an entity has established a non-accrual policy, some confirmation by the board that this is the case would help avoid undue confusion. Additionally, non-credit discounts or premiums on originated loans can be substantial especially with regard to commercial portfolios where lenders are often compensated in the form of origination fees.</p>	<p>Completed</p>
<p>Should a negative allowance (basis recovery) for PCD assets be limited to the amortized cost basis previously written off and expected to be written off by the entity? If not, please explain why and what changes should be made instead.</p>		<p>Completed</p>
<p>Should the recognition of a negative allowance (basis recovery) be extended to available-for-sale (AFS) debt securities? Please explain why and what changes, if any, should be made instead.</p>		<p>Completed</p>
<p>Should an entity be permitted to adjust the effective</p>		<p>Completed</p>

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<p>interest rate on existing TDRs using prepayment assumptions on the date of adoption of Topic 326 rather than the prepayment assumptions in effect immediately before the restructuring? If not, please explain why and what changes, if any, should be made instead.</p>		
<p>Will the proposed amendment to permit an election of a practical expedient to disclose the total amount of accrued interest receivables separately from other components of amortized cost basis for certain disclosure requirements simplify and reduce operational concerns when implementing the guidance in Update 2016-13?</p>		<p>Completed</p>
<p>Do you support the proposed amendments to clarify the application of the collateral maintenance practical expedient in accordance with paragraph 326-20-35-6? If not, please explain why and what changes, if any, should be made instead.</p>		<p>Completed</p>

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<p>Will the proposed effective dates provide sufficient time for entities to implement the proposed amendments? If not, please explain why and how much time would be needed to adopt the proposed amendments.</p>		<p>Completed</p>
<p>Do you support the proposed transition method and transition disclosures when adopting the proposed amendments? If not, please explain why and what transition method and disclosure changes should be required instead.</p>		<p>Completed</p>
<p>Please provide any additional comments on the proposed Update:</p>		<p>Completed</p>
<p>Please provide any comments on the electronic feedback process:</p>		<p>Completed</p>