



May 29, 2015

*Via Electronic Mail*

**Re: Accounting Standards Update No. 2014-09, Revenue from Contracts with Customers (Topic 606), Deferral of the Effective Date**

Dear Sirs:

The Clearing House Association L.L.C. (“**The Clearing House**”)<sup>1</sup> appreciates the opportunity to comment on the Proposed Accounting Standards Update (“**ASU**”) No. 2014-09, *Revenue from Contracts with Customers (Topic 606)*, Deferral of the Effective Date (the “**Proposal**”). The Clearing House supports the efforts of the Financial Accounting Standards Board (“**FASB**” or the “**Board**”) to be responsive to the needs of its constituents and ensure a seamless transition to this important new standard.

We support deferral of the effective date of the new standard by one year or more. We believe that deferral is advisable in light of the pending standard-setting activity related to the new standard and ongoing industry discussions about how to interpret the new standard. Deferral will allow sufficient time for any important industry-wide interpretation questions to be resolved and will give companies adequate time to implement. Without a deferral, companies may need to begin full implementation efforts before the standard-setting activity and industry discussion is complete and this may create a burden of changing the application of the standard after it has been partially or fully implemented.

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<sup>1</sup> Established in 1853, The Clearing House is the oldest banking association and payments company in the United States. It is owned by the world’s largest commercial banks, which collectively hold more than half of all U.S. deposits and which employ over one million people in the United States and more than two million people worldwide. The Clearing House Association L.L.C. is a nonpartisan advocacy organization that represents the interests of its owner banks by developing and promoting policies to support a safe, sound and competitive banking system that serves customers and communities. Its affiliate, The Clearing House Payments Company L.L.C., which is regulated as a systemically important financial market utility, owns and operates payments technology infrastructure that provides safe and efficient payment, clearing and settlement services to financial institutions, and leads innovation and thought leadership activities for the next generation of payments. It clears almost \$2 trillion each day, representing nearly half of all automated clearing house, funds transfer and check-image payments made in the United States. See The Clearing House’s web page at [www.theclearinghouse.org](http://www.theclearinghouse.org).

We also support the Board's proposal to permit earlier application of the standard as of the original effective date of ASU 2014-09. We believe that this will avoid unfairly penalizing companies that do not face any unsettled implementation issues and are consequently ready to adopt the ASU as of the original effective date. We believe that any noncomparability that might arise across entities as a result of allowing an earlier optional implementation date would be for a fairly short period and would be mitigated by the disclosures that companies who opt for the later implementation date would be required to make regarding the impact of the new ASU on their financial statements.

Finally, we support the decision of the International Accounting Standards Board ("**IASB**") to proceed with a similar proposal to defer the effective date of IFRS 15, *Revenue from Contracts with Customers*. In light of the fact that this is an almost-fully converged standard, we agree with the recommendation of the IASB staff that it would be less confusing for the market to have both IFRS and U.S. GAAP preparers implement the standards at the same time.

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If you have any questions, please contact me at (212) 613-9883 (email: [david.wagner@theclearinghouse.org](mailto:david.wagner@theclearinghouse.org)) or Ryan Pozin at (212) 613-0135 (email: [ryan.pozin@theclearinghouse.org](mailto:ryan.pozin@theclearinghouse.org)).

Sincerely yours,



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*The Clearing House Association L.L.C.*

cc: Mr. Russell Golden  
Chairman  
*Financial Accounting Standards Board*

Mr. Hans Hoogervorst  
Chairman  
*International Accounting Standards Board*

Mr. James Schnurr  
Chief Accountant

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