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December 6, 2024

Mr. Jackson Day
Technical Director
Financial Accounting Standards Board
801 Main Avenue
PO Box 5116
Norwalk, CT 06856-5116

Via Email to director@fasb.org

Re: File Reference No. 2024-ED800

Dear Mr. Day,

Grant Thornton LLP appreciates the opportunity to comment on the proposed Accounting Standards Update (ASU), *Clarifying the Effective Date (Income Statement – Reporting Comprehensive Income – Expense Disaggregation Disclosures (Subtopic 220-40))*.

We agree that the proposed amendments would clarify that the guidance in ASC 220-40 is effective for interim reporting periods *within annual reporting periods* beginning after December 15, 2027. We acknowledge that without such clarification, a non-calendar year-end reporting entity could have interpreted the effective date guidance in ASC 220-40-65-1(a) to require adoption in an interim reporting period.

We would be pleased to discuss our comments with you. If you have any questions, please contact Rahul Gupta (Rahul.Gupta@us.gt.com) or Carolyn Warger (Carolyn.Warger@us.gt.com).

Sincerely,

/s/ Grant Thornton LLP