

Metlife Insurance K.k.

Metlife Insurance K.k. 2018 Q3- TEST A- RBS- 9/19/18(3)

Entity Type: For profit

Date Printed: 2018-09-18

Checklist Tailoring Summary		
Industry(ies)	Events & Transactions	New Standards Adopted
		<ul style="list-style-type: none">• rdPBE• asu201409• asu201707• asu201618• asu201615• asu201604• asu201601• asu201616• asu201710• asu201705

General Instructions to Form 10-Q

Note: The information required by Parts I and II of Form 10-Q may be incorporated by reference from the quarterly report to shareholders provided the information in the report to shareholders meets the requirements governing the information to be included in Form 10-Q (e.g., Regulations S-X and S-K). Information incorporated by reference must be filed as an exhibit to the Form 10-Q report within the required filing deadlines.

References: [Form 10-Q](#)

Note: General Instruction D to Form 10-Q and Rule 12b-23 of the 1934 Act provide detailed instructions about the procedures to be followed when incorporating information by reference.

References: [Form 10-Q](#)

Note: The form and content of interim financial statements in quarterly reports to shareholders is governed only by the provisions of ASC 270-10-50-1 through 50-4 when such statements are not incorporated by reference into a Form 10-Q filing.

Note: Quarterly reports to shareholders may be combined with the required information of Form 10-Q and filed with the SEC. In such cases, see General Instruction E to Form 10-Q.

References: [Form 10-Q](#)

Note: Under certain circumstances, registrants that are wholly-owned subsidiaries of companies reporting under the 1934 Act may omit certain information from Form 10-Q. Details of the modifications permitted are contained in General Instruction H to Form 10-Q.

References: [Form 10-Q](#)

Note: A parent and its subsidiary are allowed to file combined periodic reports in cases where (1) the parent owns substantially all of the stock of the subsidiary, (2) there are no more than nominal differences between the financial statements of the parent and the subsidiary, and (3) the non-financial disclosures of the parent and subsidiary are substantially similar, if the combined Form 10-Q includes certain other specified disclosures. These disclosures include, among other items, separate reviewed interim financial statements for each entity (in this context the requirement is intended to apply to the primary financial statements), separate financial statement notes for areas which are different between the parent and the subsidiary (e.g., debt or capital structure), separate reports on disclosure controls and procedures for each entity, and separate CEO/CFO Certifications for each entity. With respect to other disclosure items required by Form 10-Q, any material differences between the parent and the subsidiary would be discussed separately.

References: [FRM 1370.1](#)

Cover Page/Due Date

Non-accelerated Filers: Form 10-Q must be filed within 45 days after the end of each of the first three fiscal quarters of each year for registrants who do not meet the definition of an accelerated filer. No report is required for the fourth quarter.

References: [Form 10-Q](#)

Accelerated and Large Accelerated Filers: Companies that have a public float of at least \$75 million (but less than \$700 million) or \$700 million respectively, that have been subject to the 1934 Exchange Act for at least 12 calendar months and that previously filed at least one annual report must file Form 10-Q within 40 days after the end of each of the first three fiscal quarters.

References: [Form 10-Q](#)

Note: A first-time registrant is required to file its first Form 10-Q by the later of (i) 45 days after the effective date of the initial registration statement, or (ii) the date on which the Form 10-Q would have otherwise been due (i.e., if the issuer had been a reporting company as of its last fiscal quarter).

References: [Form 10-Q](#)

Note: If the due date is a Saturday, Sunday, or legal holiday, the due date becomes the next business day.

References: [Form 10-Q](#)

Line Item(s)	Response
<p>Indicate by check mark on the cover page:</p> <p>References: <u>Form 10-Q</u></p>	
<p>Whether the registrant:</p> <p>References: <u>Form 10-Q</u></p>	
<p>Has filed all reports required to be filed by Section 13 or 15(d) of the Securities Exchange Act of 1934 during the preceding 12 months (or for such shorter period that the registrant was required to file such reports).</p> <p>References: <u>Form 10-Q</u></p>	
<p>Has submitted electronically and posted on its corporate Web site, if any, every Interactive Data File required to be submitted and posted pursuant to Rule 405 of Regulation S-T during the preceeding 12 months (or for such shorter period that the registrant was required to submit and post such files).</p> <p>References: <u>Form 10-Q</u></p>	
<p>Has been subject to such filing requirements for the past 90 days.</p> <p>References: <u>Form 10-Q</u></p>	
<p>Whether the registrant is a large accelerated filer, an accelerated filer, a non-accelerated filer, a smaller reporting company, or an emerging growth company.</p> <p>References: <u>Form 10-Q</u></p>	
<p>If an emerging growth company: has elected not to use the extended transition period for complying with any new or revised financial accounting standards provided pursuant to Section 13(a) of the Exchange Act.</p> <p>References: <u>Form 10-Q</u></p>	
<p>Whether the registrant is a shell company.</p> <p>References: <u>Form 10-Q</u></p>	

Line Item(s)	Response
Part I. Financial Information, Item 1. Financial Statements	
Include the following on the face of each financial statement:	
A suitable heading	
The company name	
A description of each statement	
The date of or periods covered by each statement	
Include a statement at the bottom of each financial statement that refers to the accompanying footnotes	
Each page of the interim financial information should be clearly marked as "unaudited."	
It is generally inappropriate to designate the condensed interim period balance sheet data "unaudited" when no indication is made regarding the audit status of the condensed year-end balance sheet data presented. The "unaudited" designation relative to the interim date may imply that the condensed year-end data has been audited and, therefore, includes all required disclosures. The notes to the condensed financial statement should include the following statement:	
<p>The year-end condensed balance sheet data was derived from audited financial statements, but does not include all disclosures required by accounting principles generally accepted in the United States of America.</p> <p>References: <u>PCAOB 3315.04 (SAS 42)</u>.</p>	
Condensed statements References: <u>S-X 10-01(a)</u> .	
<p>Provide consolidated interim financial statements (these may be unaudited). Separate statements of other entities and detailed schedules otherwise required by Regulation S-X may be omitted in certain situations.</p> <p>References: <u>S-X 10-01(a)(1)</u>. <u>S-X 10-01(a)(6)</u>.</p>	
<p>Note: For interim reporting purposes, the major captions prescribed by Regulation S-X may be combined with others provided certain tests are met, as described in the relevant sections below.</p>	

Line Item(s)	Response
	<p>Note: Captions previously combined in a Form 10-Q report, but required to be stated separately in the Form 10-Q for the current quarter, should be retroactively reclassified to conform to the current period's presentation.</p> <p>References: <u>SAB Topic 6.G.2.a(q.1)</u>.</p>
	<p>Note: Notwithstanding the condensation criteria described in the financial statement sections below, captions relating to immaterial accounts need not be separately presented (e.g., a caption that fluctuates more than the prescribed percentage, but that is immaterial in relation to total assets or average net income attributable to the registrant may be combined with another caption).</p> <p>References: <u>S-X 4-02</u></p>
<p>Periods Required</p> <p>References: <u>S-X 10-01(c)</u>.</p>	
<p>Present a balance sheet as of:</p> <p>References: <u>S-X 10-01(c)(1)</u></p>	
	<p>The end of the most recent interim fiscal quarter.</p> <p>References: <u>S-X 10-01(c)(1)</u></p>
	<p>The end of the preceding fiscal year (may be condensed to the same degree as the interim balance sheet).</p> <p>References: <u>S-X 10-01(c)(1)</u></p>
	<p>The end of the corresponding fiscal quarter of the preceding year, if necessary, to understand the impact of seasonal fluctuations on the registrant's financial condition.</p> <p>References: <u>S-X 10-01(c)(1)</u></p>
<p>Present an income statement and comprehensive income statement (either in one continuous statement with net income or in two separate, but consecutive, statements) for:</p> <p>References: <u>ASC 220-10-45-18</u> <u>S-X 10-01(c)(2)</u></p>	

Line Item(s)	Response
	<p>The most recent interim fiscal quarter.</p> <p>References: <u>S-X 10-01(c)(2)</u></p>
	<p>The year-to-date for the current year (if more than one quarter has elapsed).</p> <p>References: <u>S-X 10-01(c)(2)</u></p>
	<p>The corresponding interim and year-to-date periods of the preceding fiscal year.</p> <p>References: <u>S-X 10-01(c)(2)</u></p>
	<p>Note: Such statements may also be presented for the cumulative twelve month period ended during the most recent fiscal quarter and for the corresponding preceding period.</p> <p>References: <u>S-X 10-01(c)(2)</u></p>
	<p>Present a statement of cash flows for:</p> <p>References: <u>S-X 10-01(c)(3)</u></p>
	<p>The current year to date.</p> <p>References: <u>S-X 10-01(c)(3)</u></p>
	<p>The corresponding period of the preceding fiscal year.</p> <p>References: <u>S-X 10-01(c)(3)</u></p>
	<p>Note: Such statements may also be presented for the cumulative twelve month period ended during the most recent fiscal quarter and for the corresponding preceding period.</p> <p>References: <u>S-X 10-01(c)(3)</u></p>
	<p>Certain agricultural registrants may provide statements of income and statements of cash flows for the cumulative 12-month period ended during the most recent fiscal quarter and for the corresponding preceding period in lieu of the year-to-date statements described above.</p> <p>References: <u>S-X 10-01(c)(4)</u></p>

Line Item(s)	Response
	<p>Companies engaged in the electric, gas, water, or telephone businesses should also refer to Item (b) of Rule 3-03 for an additional interim reporting option. These companies may include statements of income and cash flows (which may be unaudited) for the twelve-month period ending on the date of the most recent balance sheet being filed, in lieu of the statements of income and cash flows for the interim periods specified. Smaller reporting companies may follow the requirements of S-X 8-03 rather than Article 10 of Regulation S-X. Other registrants may furnish such statements only in addition to the periods specified above.</p> <p>References: <u>S-X 3-03(b)</u>. <u>S-X 8-03</u></p>
Balance sheet	
	<p>Include the major captions prescribed by Regulation S-X.</p> <p>References: <u>S-X 10-01(a)(2)</u>.</p>
	<p>Major captions that are less than 10 percent of total assets and have not changed by more than 25 percent since the end of the preceding fiscal year may be combined.</p> <p>References: <u>S-X 10-01(a)(2)</u>.</p>
	<p>Inventory components (raw materials, work in process, and finished goods) are required to be disclosed either on the face of the balance sheet or in the notes to the financial statements.</p> <p>References: <u>S-X 10-01(a)(2)</u>.</p>
Income statement	
	<p>Include the major captions prescribed by Regulation S-X.</p> <p>References: <u>S-X 10-01(a)(3)</u>.</p>
	<p>Major captions that are less than 15 percent of average net income for the three latest fiscal years and have not changed by more than 20 percent compared with the corresponding interim period of the preceding fiscal year may be combined. Loss years should be excluded from the calculation of average net income. If losses were incurred for the three latest fiscal years, average loss should be used for purposes of this test.</p> <p>References: <u>S-X 10-01(a)(3)</u>.</p>

Line Item(s)	Response
	<p>Notwithstanding the test above, de minimis amounts need not be shown separately, except that registrants reporting under Article 9 shall show investment securities gains or losses separately regardless of size.</p> <p>References: <u>S-X 10-01(a)(3)</u>.</p>
Earnings and Dividends-Per-Share Data	
	<p>Include on the face of the income statement:</p> <p>References: <u>S-X 10-01(b)(2)</u>.</p>
	<p>Earnings per share applicable to common stock</p> <p>References: <u>S-X 10-01(b)(2)</u>.</p>
	<p>The basis for the computation of earnings per share</p> <p>References: <u>S-X 10-01(b)(2)</u>.</p>
	<p>The number of shares used in the computation of earnings per share</p> <p>References: <u>S-X 10-01(b)(2)</u>.</p>
	<p>Dividends declared per share applicable to common stock</p> <p>References: <u>S-X 10-01(b)(2)</u>.</p>
Comprehensive income	
	<p>An entity shall present, either on the face of the financial statements or as a separate disclosure in the notes, the following:</p> <p>References: <u>ASC 270-10-50-1(r)</u>.</p>
	<p>Present separately for each component of other comprehensive income, the changes in the accumulated balances for each component of other comprehensive income included in that separate component of equity, as required in paragraph 220-10-45-14.</p> <p>References: <u>ASC 220-10-45-14A</u></p>

Line Item(s)	Response
	<p>For each component of other comprehensive income, separately present current period reclassifications out of accumulated other comprehensive income and other amounts of current-period other comprehensive income. Both before-tax and net-of-tax presentations are permitted provided the entity complies with ASC 220-10-45-12.</p> <p>References: <u>ASC 220-10-45-14A</u></p>
	<p>Separately provide information about the effects on net income of significant amounts reclassified out of each component of accumulated other comprehensive income if those amounts all are required under other Topics to be reclassified to net income in their entirety in the same reporting period.</p> <p>References: <u>ASC 220-10-45-17</u></p>
	<p>If an entity chooses to present information about the effects of significant amounts reclassified out of accumulated other comprehensive income on net income, on the face of the statement where net income is presented:</p> <p>References: <u>ASC 220-10-45-17A</u></p>
	<p>The entity shall present parenthetically by component of other comprehensive income the effect of significant reclassification amounts on the respective line items of net income.</p> <p>References: <u>ASC 220-10-45-17A</u></p>
	<p>Present parenthetically the aggregate tax effect of all significant reclassifications on the line item for income tax benefit or expense in the statement where net income is presented.</p> <p>References: <u>ASC 220-10-45-17A</u></p>
	<p>Note: However, if an entity chooses to use a separate line item or items in the income statement to present significant pension cost components or other postretirement benefit cost components reclassified out of accumulated other comprehensive income, it shall no longer be required to present those pension cost components or other postretirement benefit cost components parenthetically.</p> <p>References: <u>ASC 220-10-45-17A</u></p>

Line Item(s)	Response
	<p>Note: If an entity is unable to identify the line item of net income affected by any significant amount reclassified out of accumulated other comprehensive income in a reporting period (including when all reclassifications for the period are not to net income in their entirety), the entity must follow the guidance in paragraph 220-10-45-17B (see below).</p> <p>References: ASC 220-10-45-17A</p>
	<p>If an entity chooses to present information about significant amounts reclassified out of accumulated other comprehensive income in the notes to the financial statements or is required to do so by the preceding paragraph above:</p> <p>References: ASC 220-10-45-17B</p>
	<p>Present the significant amounts by each component of accumulated other comprehensive income and provide a subtotal of each component of comprehensive income</p> <p>References: ASC 220-10-45-17B</p>
	<p>The subtotals for each component shall agree with the requirements in paragraph 220-10-45-14A.</p> <p>References: ASC 220-10-45-17B</p>
	<p>Note: Both before-tax and net-of-tax presentations are permitted provided the entity complies with the requirements in paragraph 220-10-45-12.</p> <p>References: ASC 220-10-45-17B</p>
	<p>For each significant reclassification amount, the entity shall identify, for those amounts that are required under other Topics to be reclassified to net income in their entirety in the same reporting period, each line item affected by the reclassification on the statement where net income is presented.</p> <p>References: ASC 220-10-45-17B</p>
	<p>For any significant reclassification for which other Topics do not require that reclassification to net income in its entirety in the same reporting period, the entity shall cross-reference to the note where additional details about the effect of the reclassifications are disclosed</p> <p>References: ASC 220-10-45-17B</p>
Statement of cash flows	

Line Item(s)	Response
<p>The statement of cash flows may be abbreviated, as follows:</p> <p>References: <u>S-X 10-01(a)(4)</u>.</p>	
<p>The statement may begin with a single amount representing cash flows from operating activities.</p> <p>References: <u>S-X 10-01(a)(4)</u>.</p>	
<p>Changes in investing and financing cash flows should be shown individually when they exceed 10 percent of the average of net cash flows from operating activities for the most recent three years. Notwithstanding this test, S-X 4-02 applies, and de minimis amounts, therefore, need not be shown separately.</p> <p>References: <u>S-X 10-01(a)(4)</u>.</p>	
<p>Note: Years in which operations resulted in a net outflow of funds should be excluded from the computation of the average funds provided by operations. If there was a net outflow of funds in each of the three latest fiscal years, the average net outflow of funds should be used for purposes of this test.</p> <p>References: <u>SAB Topic 6.G2.a., Q3</u></p>	
<p>Information about individual noncash investing and financing activities also may be abbreviated by reporting them in related disclosures only when they exceed 10 percent of the above-mentioned average.</p> <p>References: <u>ASC 230-10-50-3</u></p>	
<p>Note: Examples of noncash investing and financing transactions are converting debt to equity; acquiring assets by assuming directly related liabilities, such as purchasing a building by incurring a mortgage to the seller; entering into a capital lease, or if the entity has adopted ASU 2016-02, obtaining a right-of-use asset in exchange for a lease liability; if the entity has adopted ASU 2016-15, obtaining a beneficial interest as consideration for transferring financial assets (excluding cash), including the transferor's trade receivables, in a securitization transaction; obtaining a building or investment asset by receiving a gift; and exchanging noncash assets or liabilities for other noncash assets or liabilities.</p> <p>References: <u>ASC 230-10-50-4</u></p>	
<p>Statement of changes in shareholders' equity</p>	

Line Item(s)	Response
	<p>Significant changes in stockholders' equity accounts subsequent to the most recent fiscal year should be disclosed either in a statement of changes in stockholders' equity or in the footnotes. The SEC staff on occasion has required disclosure of all changes in stockholders' equity accounts for an interim period either in a statement or in the footnotes.</p> <p>References: <u>SEC Volume 3140.3(1)(e)</u></p>
	<p>Registrants with one or more non-controlling interests should include reconciliations from the beginning of the current year to the balance sheet date as well as for the comparative year to date period.</p> <p>References: <u>SEC Volume 3140.3(1)(e)</u></p>
General Disclosures	
	<p>Note: Registrants may presume that users of the interim financial information have read or have access to the audited financial statements for the preceding fiscal year and that the adequacy of additional disclosure needed for a fair presentation, except in regard to material contingencies, may be determined in that context.</p> <p>References: <u>S-X 10-01(a)(5)</u></p>
	<p>Include sufficient disclosure either on the face of the financial statements or in footnotes to make the information presented not misleading.</p> <p>References: <u>S-X 10-01(a)(5)</u></p>
	<p>Omit footnote information that would substantially duplicate the disclosure contained in the most recent annual report or the latest audited financial statements (e.g., statements of significant accounting policies and practices and detailed accounts and disclosures that have not significantly changed).</p> <p>References: <u>S-X 10-01(a)(5)</u></p>
	<p>From a disclosure standpoint, consideration is required to be given in Form 10-Q to new or changed circumstances since the most recent annual period that have a material impact on the registrant, including the following:</p> <p>References: <u>S-X 10-01(a)(5)</u></p>
	<p>Changes in accounting principles and practices.</p> <p>References: <u>S-X 10-01(a)(5)</u></p>

Line Item(s)	Response
<p>Disclose the impact that recently issued accounting standards will have on the financial statements of the registrant when adopted in a future period.</p> <p>References: <u>SAB 74 (SAB Topic 11.M)</u></p>	
<p>Changes in estimates inherent in preparation of financial statements (e.g., reserves, etc.).</p> <p>References: <u>S-X 10-01(a)(5)</u></p>	
<p>Changes in status of long-term contracts.</p> <p>References: <u>S-X 10-01(a)(5)</u></p>	
<p>Changes in capitalization, including significant new borrowings or modification of existing financial arrangements.</p> <p>References: <u>S-X 10-01(a)(5)</u></p>	
<p>Changes in the reporting entity resulting from new business combinations or dispositions.</p> <p>References: <u>S-X 10-01(a)(5)</u></p>	
<p>Issuances of new debt or equity securities.</p> <p>References: <u>FSP 27.4.7.1</u></p>	
<p>Changes to significant risks and uncertainties.</p> <p>References: <u>FSP 27.4.7.1</u></p>	
<p>Explain any exceptions to comparability between years, including, if any, reclassifications.</p> <p>References: <u>ASC 205-10-45-3</u></p>	
<p>If the fiscal period of a consolidated subsidiary differs from that of the parent, disclose the effect of intervening events which materially affect the financial statements.</p> <p>References: <u>ASC 810-10-45-12</u></p>	

Line Item(s)	Response
Management's Representation	
<p>Include a statement indicating that in management's opinion, all adjustments necessary for a fair statement are reflected in the interim periods presented. If all adjustments are of a normal recurring nature, a statement to that effect shall be made; otherwise, furnish information describing the nature and amount of any other adjustments.</p> <p>References: <u>S-X 10-01(b)(8)</u>.</p>	
<p>If adjustments are reflected which are not of a normal recurring nature, include information describing in appropriate detail the nature and amount of any adjustments other than normal recurring adjustments entered into the determination of the results shown.</p> <p>References: <u>S-X 10-01(b)(8)</u>.</p>	
Summarized financial information	
<p>Note: If summarized financial data are regularly reported on a quarterly basis, the following information with respect to the current quarter and the current year-to-date or the last 12 months to date should be furnished together with comparable data for the preceding year.</p> <p>References: <u>ASC 270-10-50-1</u></p>	
If publicly traded companies report summarized financial information at interim dates (including reports on fourth quarters), the following data should be reported, as a minimum:	
<p>Sales or gross revenues</p> <p>References: <u>ASC 270-10-50-1(a)</u></p>	
<p>Provision for income taxes</p> <p>References: <u>ASC 270-10-50-1(a)</u></p>	
<p>Net income</p> <p>References: <u>ASC 270-10-50-1(a)</u></p>	

Line Item(s)	Response
<p>Comprehensive income</p> <p>References: <u>ASC 270-10-50-1(a)</u></p>	
<p>Basic and diluted earnings per share data for each period presented determined in accordance with the provisions of ASC 260. See footnote disclosures discussed below.</p> <p>References: <u>ASC 270-10-50-1(b)</u></p>	
<p>Seasonal revenue, costs, or expenses</p> <p>References: <u>ASC 270-10-50-1(c)</u></p>	
<p>To avoid the possibility that interim results with material seasonal variations may be taken as fairly indicative of the estimated results for a full fiscal year, such entities shall disclose the seasonal nature of their activities, and consider supplementing their interim reports with information for 12-month periods ended at the interim date for the current and preceding years.</p> <p>References: <u>ASC 270-10-45-11</u></p>	
<p>Disclose significant changes in financial position</p> <p>References: <u>ASC 270-10-50-1(h)</u></p>	
<p>Effects of disposals of a component of an entity and unusual or infrequently occurring transactions and events that are material with respect to the operating results of the interim period shall be reported separately. Gains or losses from disposal of a component of an entity and unusual or infrequently occurring items shall not be prorated over the balance of the fiscal year.</p> <p>References: <u>ASC 270-10-50-1(e)</u> <u>ASC 270-10-45-11A</u> <u>ASC 270-10-50-5</u></p>	
<p>Income Taxes</p>	

Line Item(s)	Response
	<p>Application of the requirements for accounting for income taxes in interim periods may result in a significant variation in the customary relationship between income tax expense and pretax accounting income. The reasons for significant variations in the customary relationship between income tax expense and pretax accounting income shall be disclosed in the interim period financial statements if they are not otherwise apparent from the financial statements or from the nature of the entity's business.</p> <p>References: <u>ASC 740-270-50-1</u> <u>FSP 29.4.7.6</u></p>
	<p>In addition, if important developments occur during the year or if the tax amounts reported for the interim periods do not adequately reflect events that the reporting entity expects to occur, disclosure of these matters should be considered.</p> <p>References: <u>FSP 27.4.7.6</u></p>
	<p>Interim period disclosures related to income taxes often include:</p> <p>References: <u>FSP 29.4.7.6</u></p>
	<p>Tax effects of significant unusual or infrequent items that are recorded separately or items that are reported net of their related tax effect</p> <p>References: <u>FSP 29.4.7.6</u></p>
	<p>Significant changes in estimates or provisions for income taxes (e.g., changes in the assessment of the need for a valuation allowance that occur during the period)</p> <p>References: <u>ASC 270-10-50-1(d)</u> <u>FSP 29.4.7.6</u></p>
	<p>Material changes to (1) uncertain tax benefits, (2) amounts of uncertain tax benefits that if realized would affect the estimated annual effective tax rate, (3) total amounts of interest and penalties recognized in the balance sheet, (4) positions for which it is reasonably possible that the total amount of uncertain tax benefits will significantly increase or decrease within the next 12 months, and (5) the description of tax years that remain open by major tax jurisdiction</p> <p>References: <u>FSP 29.4.7.6</u></p>

Line Item(s)	Response
<p>Material changes in unrecognized tax benefits that occur during an interim period should be disclosed during the interim period. A reporting entity should not delay disclosure of material changes until the end of the annual reporting period.</p> <p>References: <u>FSP 29.4.7.6</u></p>	
Costs and Expenses	
<p>Disclose in a footnote the nature and amount of costs and expenses incurred in one interim period that cannot be readily identified with activities or benefits of another interim period (and are, therefore, charged to income) unless comparable with the corresponding period of the preceding fiscal year (e.g., research and development costs or advertising costs).</p> <p>References: <u>ASC 270-10-45-8</u></p>	
<p>Contingencies and other uncertainties that could be expected to affect the fairness of presentation of financial data at an interim date shall be disclosed in interim reports in the same manner required for annual reports. Such disclosures shall be repeated in interim and annual reports until the contingencies have been removed, resolved, or have become immaterial. The significance of a contingency or uncertainty should be judged in relation to annual financial statements. Disclosures of such items shall include, but not be limited to, those matters that form the basis of a qualification of an independent auditor's report.</p> <p>References: <u>ASC 270-10-50-1(f)</u>, <u>ASC 270-10-50-6</u> <u>S-X 10-01(b)(5)</u></p>	
Changes in accounting principles or changes in accounting estimates in accordance with ASC 250	
<p>Each report of interim financial information shall indicate any change in accounting principles or practices from those applied in any of the following: a. The comparable interim period of the prior annual period b. The preceding interim periods in the current annual period c. The prior annual report.</p> <p>References: <u>ASC 270-10-45-12</u></p>	

No restatement of previously reported interim information shall be made for changes in estimates, but the effect on earnings of a change in estimate made in a current interim period shall be reported in the current and subsequent interim periods, if material in relation to any period presented and shall continue to be reported in the interim financial information of the subsequent year for as many periods as necessary to avoid misleading comparisons. Such disclosure shall conform with ASC 250-10-50-4 (see below).

References: ASC 270-10-45-14

The effect on income from continuing operations, net income (or other appropriate captions of changes in the applicable net assets or performance indicator), and any related per-share amounts of the current period shall be disclosed for a change in estimate that affects several future periods, such as a change in service lives of depreciable assets. Disclosure of those effects is not necessary for estimates made each period in the ordinary course of accounting for items such as uncollectible accounts or inventory obsolescence; however, disclosure is required if the effect of a change in the estimate is material. When an entity effects a change in estimate by changing an accounting principle, the disclosures required by paragraphs 250-10-50-1 through 50-3 also are required. If a change in estimate does not have a material effect in the period of change but is reasonably certain to have a material effect in later periods, a description of that change in estimate shall be disclosed whenever the financial statements of the period of change are presented.

References: ASC 250-10-50-4

State the date of, and reasons for, making any material discretionary accounting change.

References: S-X 10-01(b)(6)

If a discretionary accounting change has been made during one of the first three quarters of the latest fiscal year, include a letter from the independent accountant commenting on the preferability of the change as an exhibit to the Form 10-Q filed for the quarter in which the change is made.

References: S-X 10-01(b)(6)

S-K 601(b)(18)

Note: Preferability letters need not be furnished in connection with accounting changes required by adoption of new standards or for a change in estimate affected by a change in accounting principle (for the latter, this type of change may only be made if it is justifiable on the basis that it is preferable).

References: S-X 10-01(b)(6)

S-K 601(b)(18)

The SEC staff has indicated that if a new accounting standard has been adopted in an interim period, all of the disclosures prescribed by the standard for annual financial statements should be included in the interim financial statements, in addition to any transitional disclosures required by the standard. The disclosures should be repeated in Form 10-Qs filed subsequent to the interim period of adoption until the next Form 10-K is filed.

References: S-X 10-01(a)

FRM 1500

SEC Volume 3140.33

Note: If a registrant has a discontinued operation or a retrospectively applied change in accounting principle subsequent to the registrant's filing of its Form 10-K, the registrant should evaluate the need for S-X 3-09 financial statements in a subsequently filed registration or proxy statement. The assessment should be based on its historical financials in the registrant's most recent Form 10-K, not the financial statements that give retrospective effect to the discontinued operation or change in accounting principle and are included or incorporated into the registration or proxy statement.

References: SEC FRM 2410.8

Prior Period Adjustments

For any material retroactive prior-period adjustment made during any period covered by the interim financial statements, disclose the adjustment together with the effect on net income and net income attributable to the registrant (total and per share) of any prior period included and on the balance of retained earnings. If results of operations for any period presented have been adjuted retroactively by such an item subsequent to the initial reporting of such period, similar disclosure of the effect of the change shall be made.

References: ASC 250-10-50-9

S-X 10-01(b)(7)

For any material retroactive prior-period adjustment related to prior interim periods of the current fiscal year, disclose:

References: ASC 250-10-50-11

S-X 10-01(b)(7)

Line Item(s)	Response
<p>The effect on income from continuing operations and net income (total and per share) for each prior interim period of the current fiscal year.</p> <p>References: <u>ASC 250-10-50-11</u> <u>S-X 10-01(b)(7)</u>.</p>	
<p>Income from continuing operations and net income as restated (total and per share) for each prior interim period restated.</p> <p>References: <u>ASC 250-10-50-11</u></p>	
<p>For any material retroactive prior-period adjustment resulting in a restatement of prior fiscal year interim periods presented, disclose income tax amounts applicable to the prior-period adjustments.</p> <p>References: <u>ASC 250-10-50-9</u></p>	
<p>Segment Information</p> <p>References: <u>ASC 270-10-50-1(i)</u> <u>ASC 270-10-50-7(h)</u>.</p>	
<p>Disclose all of the following information about reportable operating segments determined according to the provisions of ASC 280, Segment reporting, including provisions related to restatement of segment information in previously issued financial statements:</p> <p>References: <u>ASC 270-10-50-1(i)</u> <u>FSP 29.4.5</u> <u>FSP 25.7.7</u></p>	
<p>Revenues from external customers.</p> <p>References: <u>ASC 270-10-50-1(i)(1)</u>.</p>	
<p>Intersegment revenues.</p> <p>References: <u>ASC 270-10-50-1(i)(2)</u>.</p>	

Line Item(s)	Response
<p>A measure of segment profit or loss.</p> <p>References: <u>ASC 270-10-50-1(i)(3)</u>.</p>	
<p>Total assets for which there has been a material change from the amount disclosed in the last annual report.</p> <p>References: <u>ASC 270-10-50-1(i)(4)</u>.</p>	
<p>A description of differences from the last annual report in the basis of segmentation or in the basis of measurement of segment profit or loss.</p> <p>References: <u>ASC 270-10-50-1(i)(5)</u>.</p>	
<p>A reconciliation of the total of the reportable segments measures of profit or loss to the enterprise's consolidated income before income taxes, discontinued operations, and the cumulative effect of changes in accounting principles. However, if, for example, an entity allocates items such as income taxes to segments, the entity may choose to reconcile the total of the segments measures of profit or loss to consolidated income after those items. Significant reconciling items shall be separately identified and described in that reconciliation.</p> <p>References: <u>ASC 270-10-50-1(i)(6)</u>.</p>	
<p>Note: Interim disclosures are required for the current quarter and the year-to-date amounts.</p> <p>References: <u>ASC 280-10-50-34</u></p>	
<p>Note: If a registrant changes segments during the current interim period, the financial statements should be prepared on the basis of the new segments that were created during the interim period that are being presented in the filing. Prior period comparative information should be recast on the new basis.</p>	
<p>Note: If a complete set of financial statements is presented in an interim period, the the full disclosure requirements of ASC 280, Segment reporting, apply.</p> <p>References: <u>FSP 29.4.5</u></p>	

Line Item(s)	Response
	<p>Note: Entity-wide disclosures, including disclosures about major customers, are not required in interim periods. However, if a reporting entity were to transact a significant amount of business with a new (or previously insignificant) customer during an interim period that was expected to continue in future periods, management should consider providing the disclosures required by ASC 280-10-50-42.</p> <p>References: <u>FSP 25.7.7</u></p>
Defined Benefit Pension and Postretirement Plans	
	<p>All of the following information about defined benefit pension plans and other defined benefit postretirement benefit plans, disclosed for all periods presented pursuant to the provisions of Subtopic 715-20:</p> <p>References: <u>ASC 270-10-50-1(j)</u>.</p>
	<p>The amount of net periodic benefit cost recognized, for each period for which a statement of income is presented, showing separately:</p> <p>References: <u>ASC 270-10-50-1(j)</u>.</p>
	<p>The service cost component.</p> <p>References: <u>ASC 270-10-50-1(j)(1)</u>.</p>
	<p>The interest cost component.</p> <p>References: <u>ASC 270-10-50-1(j)(1)</u>.</p>
	<p>The expected return on plan assets for the period.</p> <p>References: <u>ASC 270-10-50-1(j)(1)</u>.</p>
	<p>The gain or loss component.</p> <p>References: <u>ASC 270-10-50-1(j)(1)</u>.</p>
	<p>The prior service cost or credit component.</p> <p>References: <u>ASC 270-10-50-1(j)(1)</u>.</p>

Line Item(s)	Response
<p>The transition asset or obligation component.</p> <p>References: <u>ASC 270-10-50-1(j)(1)</u>.</p>	
<p>The gain or loss recognized due to a settlement or curtailment.</p> <p>References: <u>ASC 270-10-50-1(j)(1)</u>.</p>	
<p>The total amount of the employer's contributions paid, and expected to be paid, during the current fiscal year, if significantly different from amounts previously disclosed under ASC 715-20-50-1. Estimated contributions may be presented in the aggregate combining all of the following: (1) contributions required by funding regulations or laws, (2) discretionary contributions, and (3) noncash contributions.</p> <p>References: <u>ASC 270-10-50-1(j)(2)</u>.</p>	
<p>The line item(s) used in the income statement to present the components other than the service cost component shall be disclosed if the other components are not presented in a separate line item or items in the income statement.</p> <p>References: <u>ASC 715-20-50-1</u></p>	
Fair Value Disclosures	
<p>The information about the use of fair value to measure assets and liabilities recognized in the statement of financial position pursuant to Section 820-10-50.</p> <p>References: <u>ASC 270-10-50-1(k)</u></p>	
<p>Note: Plan assets of a defined benefit pension or other postretirement plan that are accounted for in accordance with ASC 715 are not subject to the disclosure requirements in ASC 820. Instead, the disclosures required in ASC 715-20-50 shall apply for fair value measurements of plan assets of a defined benefit pension or other postretirement plan.</p> <p>References: <u>ASC 820-10-50-10</u></p>	
<p>The reporting entity shall disclose sufficient information about fair value of assets and liabilities that users are able to assess the following:</p> <p>References: <u>ASC 820-10-50-1</u></p>	

Line Item(s)	Response
<p>For assets and liabilities that are measured at fair value on a recurring or nonrecurring basis in the statement of financial position after initial recognition, the valuation techniques and inputs used to develop those measurements.</p> <p>References: ASC 820-10-50-1</p>	
<p>For recurring fair value measurements using significant unobservable inputs (Level 3), the effect of the measurements on earnings (or changes in net assets) or other comprehensive income for the period.</p> <p>References: ASC 820-10-50-1</p>	
<p>While certain specific disclosures are specified, the reporting entity shall consider the following points when achieving the main objectives of ASC 820:</p> <p>References: ASC 820-10-50-1A</p>	
<p>The level of detail necessary to satisfy the disclosure requirements.</p> <p>References: ASC 820-10-50-1A</p>	
<p>How much emphasis to place on each of the various requirements.</p> <p>References: ASC 820-10-50-1A</p>	
<p>How much aggregation or disaggregation to undertake.</p> <p>References: ASC 820-10-50-1A</p>	
<p>Whether users of the financial statements need additional information to evaluate the quantitative information disclosed.</p> <p>References: ASC 820-10-50-1A</p>	
<p>If the required disclosures on their own are not sufficient to meet the objectives, a reporting entity shall disclose additional information as necessary to meet the objectives.</p> <p>References: ASC 820-10-50-1A</p>	

Line Item(s)	Response
	<p>Fair value disclosures are made by classes of assets and liabilities. The basis for determining the appropriate classes for which to prepare the disclosures are based on the following:</p> <p>References: <u>ASC 820-10-50-2B</u></p>
	<p>The nature, characteristics and risks of the asset or liability.</p> <p>References: <u>ASC 820-10-50-2B</u></p>
	<p>The level of the fair value hierarchy within which the fair value measurement is categorized. The number of classes may need to be greater for fair value measurements categorized within Level 3 of the fair value hierarchy because those measurements have a greater degree of uncertainty and subjectivity.</p> <p>References: <u>ASC 820-10-50-2B</u></p>
	<p>Note: A class of assets and liabilities will often require greater disaggregation than the line items presented in the statement of financial position. However, a reporting entity shall provide information sufficient to permit reconciliation to the line items presented in the statement of financial position. If another Topic specifies the class for an asset or a liability, a reporting entity may use that class in providing the disclosures required in this Topic if that class meets the requirements in this paragraph.</p> <p>References: <u>ASC 820-10-50-2B</u></p>
	<p>Using a tabular format disclose, at a minimum, the following for each class of assets and liabilities measured at fair value on a recurring basis in the statement of financial position after initial recognition:</p> <p>References: <u>ASC 820-10-50-2</u></p>
	<p>The fair value measurement at the end of the reporting period.</p> <p>References: <u>ASC 820-10-50-2</u></p>
	<p>The level of the fair value hierarchy within which the fair value measurements are categorized in their entirety (Level 1, 2, or 3). A fair value measurement, which may be the result of multiple inputs, is categorized in its entirety by reference to its lowest level (i.e., least reliable) significant input.</p> <p>References: <u>ASC 820-10-50-2</u></p>

Line Item(s)	Response
	<p>For nonrecurring fair value measurements, disclose the fair value measurement, the level of the fair value hierarchy, and the reasons for the fair value measurement. If the measurement date was not at the period end, clearly indicate that the information presented is not as of the period end and indicate the date or period that the measurement was taken.</p> <p>References: ASC 820-10-50-2</p>
	<p>Note: When a long-lived or indefinite-lived asset is impaired, it is written down to fair value and should be included as a nonrecurring fair value measurement (1) in the quarter in which the impairment was taken, (2) in subsequent quarters, and (3) in the year of impairment.</p> <p>References: ASC 820-10-50-2</p>
	<p>Note: The requirement to disclose the level does not apply to investments measured at Net Asset Value using the practical expedient.</p>
	<p>For assets and liabilities held at the end of the reporting period that are measured at fair value on a recurring basis, the amounts of any transfers between Level 1 and Level 2 of the fair value hierarchy, the reasons for those transfers, and the reporting entity's policy for determining when transfers between levels are deemed to have occurred. Transfers into each level shall be disclosed and discussed separately from transfers out of each level.</p> <p>References: ASC 820-10-50-2</p>
	<p>For recurring and nonrecurring fair value measurements categorized within Level 2 and Level 3 of the fair value hierarchy, a description of the valuation technique(s) and the inputs used in the fair value measurement. If there has been a change in either or both a valuation approach and a valuation technique (for example, changing from a market approach to an income approach or the use of an additional valuation technique), disclose that change and the reason(s) for making it.</p> <p>References: ASC 820-10-50-2</p>
	<p>A reporting entity shall disclose and consistently follow its policy for determining when transfers between levels of the fair value hierarchy are deemed to have occurred. The policy about the timing of recognizing transfers shall be the same for transfers into the levels as for transfers out of the levels. Examples of policies for determining the timing of transfers include: the date of the event or change in circumstances that caused the transfer; the beginning of the reporting period; and the end of the reporting period.</p> <p>References: ASC 820-10-50-2</p>

Line Item(s)	Response
	<p>For fair value measurements categorized within Level 3 of the fair value hierarchy, provide tabular presentation of quantitative information about the significant unobservable inputs used in the fair value measurement. A reporting entity is not required to create quantitative information to comply with this disclosure requirement if quantitative unobservable inputs are not developed by the entity when measuring fair value (for example, when a reporting entity uses prices from prior transactions or third-party pricing information without adjustment). However, when providing this disclosure, a reporting entity cannot ignore quantitative unobservable inputs that are significant to the fair value measurement and are reasonably available to the reporting entity.</p> <p>References: ASC 820-10-50-2</p>
	<p>Note: The quantitative disclosures about significant unobservable inputs used in fair value measurements categorized within Level 3 of the fair value hierarchy are not required for fair value measurements related to the financial accounting and reporting for goodwill after its initial recognition in a business combination.</p> <p>References: ASC 350-20-50-3</p>
	<p>Note: If a wide range of unobservable inputs is presented in the tabular disclosure, the SEC Division of Investment Management staff has requested presentation of a weighted average input consistent with the illustrative disclosure in ASC 820-10-55-103.</p>
	<p>For recurring fair value measurements categorized within Level 3 of the fair value hierarchy, a tabular presentation of a reconciliation from the opening balances to the closing balances, disclosing separately changes during the period attributable to the following:</p> <p>References: ASC 820-10-50-2</p>
	<p>Total gains or losses for the period recognized in earnings (or changes in net assets), and the line item(s) in the statement of income (or activities) in which those gains or losses are recognized.</p> <p>References: ASC 820-10-50-2</p>
	<p>Total gains or losses for the period recognized in other comprehensive income, and the line item(s) in other comprehensive income in which those gains or losses are recognized.</p> <p>References: ASC 820-10-50-2</p>
	<p>Purchases, sales, issues, and settlements (each of those types of changes disclosed separately).</p> <p>References: ASC 820-10-50-2</p>

Line Item(s)	Response
	<p>The amounts of any transfers into or out of Level 3 of the fair value hierarchy, the reasons for those transfers, and the reporting entity's policy for determining when transfers between levels are deemed to have occurred (see ASC 820-10-50-2C). Transfers into Level 3 shall be disclosed and discussed separately from transfers out of Level 3.</p> <p>References: <u>ASC 820-10-50-2</u></p>
	<p>For recurring fair value measurements categorized within Level 3 of the fair value hierarchy, the amount of the total gains or losses for the period included in earnings (or changes in net assets) that is attributable to the change in unrealized gains or losses relating to those assets and liabilities held at the end of the reporting period, and the line item(s) in the statement of income (or activities) in which those unrealized gains or losses are recognized.</p> <p>References: <u>ASC 820-10-50-2</u></p>
	<p>For recurring and nonrecurring fair value measurements categorized within Level 3 of the fair value hierarchy, a description of the valuation processes used by the reporting entity (including, for example, how an entity decides its valuation policies and procedures and analyzes changes in fair value measurements from period to period). See ASC 820-10-55-105 for further guidance.</p> <p>References: <u>ASC 820-10-50-2</u></p>
	<p>For recurring fair value measurements categorized within Level 3 of the fair value hierarchy, a narrative description of the sensitivity of the fair value measurement to changes in unobservable inputs if a change in those inputs to a different amount might result in a significantly higher or lower fair value measurement. If there are interrelationships between those inputs and other unobservable inputs used in the fair value measurement, provide a description of those interrelationships and of how they might magnify or mitigate the effect of changes in the unobservable inputs on the fair value measurement. To comply with that disclosure requirement, the narrative description of the sensitivity to changes in unobservable inputs shall include, at a minimum, the unobservable inputs disclosed in the tabular presentation.</p> <p>References: <u>ASC 820-10-50-2</u></p>
	<p>For recurring and nonrecurring fair value measurements, if the highest and best use of a nonfinancial asset differs from its current use, disclose that fact and why the nonfinancial asset is being used in a manner that differs from its highest and best use.</p> <p>References: <u>ASC 820-10-50-2</u></p>

If a reporting entity makes an accounting policy decision to apply the exception and measure fair value for a group of financial assets and financial liabilities based on how market participants would price the net risk exposure (see ASC 820-10-35-18D) then this policy election shall be disclosed.

References: [ASC 820-10-50-2D](#)

For each class of assets and liabilities not measured at fair value in the statement of financial position but for which the fair value is disclosed, provide the level of the fair value hierarchy, a description of the valuation techniques and the inputs used in the fair value measurement, any changes to the valuation techniques used and the reason for making the change. However, a reporting entity is not required to provide the quantitative disclosures about significant unobservable inputs used in fair value measurements categorized within Level 3 of the fair value hierarchy required for assets and liabilities reported at fair value in the statement of financial position. If the asset is a nonfinancial asset and the highest and best use differs from its current use, a reporting entity shall disclose that fact and why it is being used in a manner that is different than its highest and best use. A reporting entity does not need to provide the other disclosures required by ASC 820 for such assets and liabilities.

References: [ASC 820-10-50-2E](#)

For derivative assets and liabilities, the reporting entity shall present the fair value measurement at the end of the reporting period, the level of the fair value hierarchy, and any transfers between Level 1 and Level 2 on a gross basis. The tabular Level 3 reconciliation disclosure may be presented on either a gross or a net basis.

References: [ASC 820-10-50-3](#)

For a liability measured at fair value and issued with an inseparable third-party credit enhancement, disclose the existence of that credit enhancement.

References: [ASC 820-10-50-4A](#)

For investments that qualify to be measured using the Net Asset Value practical expedient on either a recurring or nonrecurring basis during the period, disclose:

References: [ASC 820-10-50-6A](#)

Information that helps the users of the entity's financial statements to understand the nature and risks of the investments.

References: [ASC 820-10-50-6A](#)

Line Item(s)	Response
<p>Whether the investments, if sold, are probable of being sold at amounts different from net asset value per share (or its equivalent, such as member units or an ownership interest in partners' capital to which a proportionate share of net assets is attributed).</p> <p>References: <u>ASC 820-10-50-6A</u></p>	
<p>The fair value measurement of the investments in the class at the reporting date and a description of the significant investment strategies of the investee(s) in the class.</p> <p>References: <u>ASC 820-10-50-6A(a)</u>.</p>	
<p>For each class of investment that includes investments that can never be redeemed with the investees, but the reporting entity receives distributions through the liquidation of the underlying assets of the investees, the reporting entity's estimate of the period of time over which the underlying assets are expected to be liquidated by the investees.</p> <p>References: <u>ASC 820-10-50-6A(b)</u>.</p>	
<p>The amount of the reporting entity's unfunded commitments related to investments in the class.</p> <p>References: <u>ASC 820-10-50-6A(c)</u></p>	
<p>A general description of the terms and conditions upon which the investor may redeem investments in the class (for example, quarterly redemption with 60 days' notice).</p> <p>References: <u>ASC 820-10-50-6A(d)</u>.</p>	
<p>The circumstances in which an otherwise redeemable investment in the class (or a portion thereof) might not be redeemable (for example, investments subject to a lockup or gate).</p> <p>References: <u>ASC 820-10-50-6A(e)</u>.</p>	
<p>For those otherwise redeemable investments that are restricted from redemption as of the reporting entity's measurement date, the reporting entity shall disclose its estimate of when the restriction from redemption might lapse. If an estimate cannot be made, the reporting entity shall disclose that fact and how long the restriction has been in effect.</p> <p>References: <u>ASC 820-10-50-6A(e)</u>.</p>	

Line Item(s)	Response
	<p>Any other significant restriction on the ability to sell investments in the class at the measurement date.</p> <p>References: <u>ASC 820-10-50-6A(f)</u>.</p>
	<p>If a group of investments would otherwise meet the criteria for a probable sale but the individual investments to be sold have not been identified (for example, if a reporting entity decides to sell 20 percent of its investments in private equity funds but the individual investments to be sold have not been identified), so the investments continue to qualify for the practical expedient, the reporting entity shall disclose its plans to sell and any remaining actions required to complete the sale(s).</p> <p>References: <u>ASC 820-10-50-6A(h)</u>.</p>
	<p>Note: The SEC Investment Management staff do not object to the use of the "practical expedient" (i.e., NAV) in valuation of investments in alternative investment funds as long as the investment company has concluded affirmatively that such measure is consistent with "value" (i.e., fair value) under Section 2(a)(41) of the Investment Company Act of 1940.</p>
	<p>For brokers and dealers, the notes to the financial statements shall disclose all of the following if financial instruments' fair values are measured at lower than quoted prices (see Example in paragraph 820-10-55-52):</p> <p>References: <u>ASC 940-820-50-1</u></p>
	<p>Description of the financial instrument</p> <p>References: <u>ASC 940-820-50-1</u></p>
	<p>The quoted price of the financial instrument</p> <p>References: <u>ASC 940-820-50-1</u></p>
	<p>Fair value reported in the statement of financial condition</p> <p>References: <u>ASC 940-820-50-1</u></p>
	<p>Methods and significant assumptions used to value the instrument at lower than the quoted price.</p> <p>References: <u>ASC 940-820-50-1</u></p>
Derivative Disclosures	

Line Item(s)	Response
	<p>The information about derivative instruments is required to be disclosed by Sections 815-10-50, 815-20-50, 815-25-50, 815-30-50, and 815-35-50. See below for annual requirements.</p> <p>References: ASC 270-10-50-1(l)</p>
	<p>An entity with derivative instruments (or nonderivative instruments that are designated and qualify as hedging instruments), shall disclose all of the following information:</p> <p>References: ASC 815-10-50-1</p>
	<p>How and why the entity uses derivative instruments (or such nonderivative instruments)</p> <p>References: ASC 815-10-50-1</p>
	<p>How derivative instruments (or such nonderivative instruments) and related hedged items are accounted for under Topic 815</p> <p>References: ASC 815-10-50-1</p>
	<p>How derivative instruments and related hedged items affect an entity's financial position, financial performance, and cash flows.</p> <p>References: ASC 815-10-50-1</p>
	<p>The disclosures should also include the following for every annual and interim reporting period in which a statement of financial position and statement of financial performance are presented:</p> <p>References: ASC 815-10-50-1A</p>
	<p>The entity's objectives for holding or issuing those instruments</p> <p>References: ASC 815-10-50-1A</p>
	<p>The context needed to understand those objectives</p> <p>References: ASC 815-10-50-1A</p>

Line Item(s)	Response
<p>The entity's strategies for achieving those objectives</p> <p>References: ASC 815-10-50-1A</p>	
<p>Information that would enable users of the entity's financial statements to understand the volume of its activity in those instruments.</p> <p>References: ASC 815-10-50-1A</p>	
<p>Note: An entity shall select the format and the specifics of disclosures relating to its volume of such activity that are most relevant and practicable for its individual facts and circumstances.</p> <p>References: ASC 815-10-50-1B</p>	
<p>Information about an entity's objectives shall be disclosed in the context of each instrument's primary underlying risk exposure (for example, interest rate, credit, foreign exchange rate, interest rate and foreign exchange rate, or overall price). Further, those instruments shall be distinguished between those used for risk management purposes and those used for other purposes. Derivative instruments used for risk management purposes include those designated as hedging instruments under Subtopic 815-20 as well as those used as economic hedges and for other purposes related to the entity's risk exposures.</p> <p>References: ASC 815-10-50-1B</p>	
<p>The instruments addressed by requirements in ASC 815-10-50-1A should be distinguished between each of the following:</p> <p>References: ASC 815-10-50-2</p>	
<p>Derivative instruments (and nonderivative instruments) used for risk management purposes, distinguished between each of the following:</p> <p>References: ASC 815-10-50-2</p>	
<p>Derivative instruments (and nonderivative instruments) designated as hedging instruments, distinguished between each of the following:</p> <p>References: ASC 815-10-50-2</p>	

Line Item(s)	Response
<p>Derivative instruments (and nonderivative instruments) designated as fair value hedging instruments.</p> <p>References: ASC 815-10-50-2</p>	
<p>Derivative instruments designated as cash flow hedging instruments</p> <p>References: ASC 815-10-50-2</p>	
<p>Derivative instruments (and nonderivative instruments) designated as hedging instruments for hedges of the foreign currency exposure of a net investment in a foreign operation.</p> <p>References: ASC 815-10-50-2</p>	
<p>Derivative instruments used as economic hedges and for other purposes related to the entity's risk exposures.</p> <p>References: ASC 815-10-50-2</p>	
<p>Derivative instruments used for other purposes.</p> <p>References: ASC 815-10-50-2</p>	
<p>For derivative instruments not designated as hedging instruments under Subtopic 815-20, the description shall indicate the purpose of the derivative activity.</p> <p>References: ASC 815-10-50-4</p>	
<p>If the simplified hedge accounting approach is applied in accounting for a qualifying receive-variable, pay-fixed interest rate swap, the settlement value of that swap may be used in place of fair value when disclosing the information required by this Section or in providing other fair value disclosures, such as those required under Topic 820 on fair value. For the purposes of complying with these disclosure requirements, amounts disclosed at settlement value will be subject to all of the same disclosure requirements as amounts disclosed at fair value. Any amounts disclosed at settlement value shall be clearly stated as such and disclosed separately from amounts disclosed at fair value.</p> <p>References: ASC 815-10-50-3</p>	
<p>Quantitative Disclosures for Derivatives</p>	

Line Item(s)	Response
	<p>Note: Contracts that meet the criteria for and that are designated under the normal purchases and normal sales (NPNS) exception are not recorded at fair value on the balance sheet and accordingly are not required to be included in the ASC 815 tabular disclosures.</p> <p>References: <u>UP 3.3.1</u></p>
	<p>Disclose all of the following for every annual and interim reporting period for which a statement of financial position and statement of financial performance are presented:</p> <p>References: <u>ASC 815-10-50-4A</u></p>
	<p>The location and fair value amounts of derivative instruments (and such nonderivative instruments) reported in the statement of financial position in accordance with the following requirements:</p> <p>References: <u>ASC 815-10-50-4A</u></p>
	<p>The fair value of derivative instruments (and such nonderivative instruments) shall be presented on a gross basis, even when those instruments are subject to master netting arrangements and qualify for net presentation in the statement of financial position in accordance with Subtopic 210-20.</p> <p>References: <u>ASC 815-10-50-4B</u></p>
	<p>Cash collateral payables and receivables associated with those instruments shall not be added or netted against the fair value amounts.</p> <p>References: <u>ASC 815-10-50-4B</u></p>
	<p>Fair value amounts shall be presented as separate asset and liability values segregated between each of the following:</p> <p>References: <u>ASC 815-10-50-4B</u></p>
	<p>Those instruments designated and qualifying as hedging instruments under Subtopic 815-20, presented separately by type of contract (for example, interest rate contracts, foreign exchange contracts, equity contracts, commodity contracts, credit contracts, other contracts, and so forth)</p> <p>References: <u>ASC 815-10-50-4B</u></p>

Line Item(s)	Response
	<p>Those instruments not designated as hedging instruments, presented separately by type of contract.</p> <p>References: <u>ASC 815-10-50-4B</u></p>
	<p>The disclosure shall identify the line item(s) in the statement of financial position in which the fair value amounts for these categories of derivative instruments are included.</p> <p>References: <u>ASC 815-10-50-4B</u></p>
	<p>The location and amount of the gains and losses on derivative instruments (and such nonderivative instruments) and related hedged items reported in any of the following:</p> <p>References: <u>ASC 815-10-50-4A(b)</u></p>
	<p>The statement of financial performance</p> <p>References: <u>ASC 815-10-50-4A(b)</u></p>
	<p>The statement of financial position (for example, gains and losses initially recognized in other comprehensive income).</p> <p>References: <u>ASC 815-10-50-4A(b)</u></p>
	<p>For nonderivative instruments that are designated and qualify as hedging instruments pursuant to paragraphs 815-20-25-58 and 815-20-25-66, an entity shall report the carrying value of the nonderivative hedging instrument, which includes the adjustment for the foreign currency transaction gain or loss on that instrument</p> <p>References: <u>ASC 815-10-50-4B</u></p>
	<p>In tabular format, present gains and losses (pursuant to ASC 815-10-50-4A(b)) on derivative instruments (and such nonderivative instruments) separately for all of the following by type of contract (for example interest rate contracts, foreign exchange rate contracts, equity contracts, commodity contracts, credit contracts, other):</p> <p>References: <u>ASC 815-10-50-4C</u></p>

Line Item(s)	Response
<p>Derivative instruments (and non-derivative instruments) designated and qualifying as hedging instruments in fair value hedges and related hedged items designated and qualifying in fair value hedges.</p> <p>References: <u>ASC 815-10-50-4C(a)</u>.</p>	
<p>The effective portion of gains and losses on derivative instruments (and nonderivative instruments) designated and qualifying in cash flow hedges and net investment hedges that was recognized in other comprehensive income during the current period.</p> <p>References: <u>ASC 815-10-50-4C(b)</u>.</p>	
<p>The effective portion of gains and losses on derivative instruments (and nonderivative instruments) designated and qualifying in cash flow hedges and net investment hedges recorded in accumulated other comprehensive income during the term of the hedging relationship and reclassified into earnings during the current period.</p> <p>References: <u>ASC 815-10-50-4C(c)</u>.</p>	
<p>The portion of gains and losses on derivative instruments (and nonderivative instruments) designated and qualifying in cash flow hedges and net investment hedges representing any of the following:</p> <p>References: <u>ASC 815-10-50-4C(d)</u>.</p>	
<p>The amount of the hedges' ineffectiveness</p> <p>References: <u>ASC 815-10-50-4C(d)(1)</u></p>	
<p>The amount, if any, excluded from the assessment of hedge effectiveness.</p> <p>References: <u>ASC 815-10-50-4C(d)(2)</u></p>	
<p>Derivative instruments not designated or qualifying as hedging instruments under Subtopic 815-20 (see paragraph 815-10-50-4F).</p> <p>References: <u>ASC 815-10-50-4C(e)</u>.</p>	

Line Item(s)	Response
	<p>For all items disclosed in accordance with paragraphs 815-10-50-4C, the entity shall separately present by type of contract and identify the line item(s) in the statement of financial performance in which the gains and losses for these categories of derivative instruments (and nonderivative instruments that are designated and qualify as hedging instruments) are included.</p> <p>References: <u>ASC 815-10-50-4D</u></p>
	<p>Gains and losses on all derivatives, including those that qualify for ASC 980 deferral should be included in the ASC 815 disclosures. The ASC 980 offset may be disclosed by including a reclassification line item in the applicable table or footnoting the amount of the offset. Additionally, companies should include disclosure explaining any regulatory deferral.</p>
	<p>For a non-hedging derivative, such as an economic hedge of debt, it is not appropriate to split the total change in the fair value of a non-hedging derivative for purposes of presentation in more than one line item in the income statement. As such, a company should present the entire change in fair value of the swap (including the periodic net settlement amounts) as interest expense to reflect its economic hedging relationship with the debt or as some other line item in the income statement such as other income or expense to reflect its speculative/non-hedging nature. In either case, the company should disclose the income statement line item in which the nonhedging derivative gains and losses are included.</p>
	<p>If a proportion of a derivative instrument is designated and qualifying as a hedging instrument, an entity shall allocate the related amounts to the appropriate categories within the disclosure tables.</p> <p>References: <u>ASC 815-10-50-4E</u></p>
Trading Derivatives	
	<p>For derivative instruments that are not designated or qualifying as hedging instruments under Subtopic 815-20, if an entity's policy is to include those derivative instruments in its trading activities (for example, as part of its trading portfolio that includes both derivative instruments and nonderivative or cash instruments), the entity can elect to not separately disclose gains and losses as required by paragraph 815-10-50-4C(e) provided that the entity discloses all of the following:</p> <p>References: <u>ASC 815-10-50-4F</u></p>
	<p>The gains and losses on trading activities recognized in the income statement, disaggregated by major types of items (e.g., fixed income/interest rates, foreign exchange, equity, commodity, and credit)</p> <p>References: <u>ASC 815-10-50-4F(a)</u></p>

Line Item(s)	Response
<p>The line items in the income statement in which trading activities gains and losses are included</p> <p>References: <u>ASC 815-10-50-4F(b)</u></p>	
<p>A description of the nature of its trading activities and related risks and how the entity manages those risks</p> <p>References: <u>ASC 815-10-50-4F(c)</u></p>	
<p>Note: If the alternative disclosure option discussed above is elected, an entity shall include a footnote in the required tables indicating the use of an alternative disclosure for trading activities.</p> <p>References: <u>ASC 815-10-50-4F</u></p>	
<p>Credit-Risk-Related Contingent Features</p>	
<p>For all derivative instruments (or such nonderivative instruments), disclose all of the following for every annual and interim reporting period for which a statement of financial position is presented:</p> <p>References: <u>ASC 815-10-50-4H</u></p>	
<p>The existence and nature of credit-risk-related contingent features and the circumstances in which those features that are in a net liability position at the end of the reporting period could be triggered</p> <p>References: <u>ASC 815-10-50-4H</u></p>	
<p>The aggregate fair value amounts of derivative instruments (or such non-derivative instruments) that contain credit-risk-related contingent features that are in a net liability position at the end of the reporting period</p> <p>References: <u>ASC 815-10-50-4H</u></p>	
<p>The aggregate fair value of assets already posted as collateral at the end of the reporting period</p> <p>References: <u>ASC 815-10-50-4H</u></p>	

Line Item(s)	Response
	<p>The aggregate fair value of additional assets that would be required to be posted as collateral and/or needed to settle the instrument immediately, if the credit-risk-related contingent features were triggered</p> <p>References: ASC 815-10-50-4H</p>
	<p>Note: Amounts required to be reported for nonderivative instruments that are designated and qualify as hedging instruments shall be the carrying value of the nonderivative hedging instrument, which includes the adjustment for the foreign currency transaction gain or loss on that instrument.</p> <p>References: ASC 815-10-50-4H</p>
	<p>Note: If information on derivative instruments (or nonderivative instruments that qualify and are designated as hedging instruments) is disclosed in more than one footnote, an entity should cross-reference in the derivative footnote and other footnotes in which derivative-related information is disclosed.</p> <p>References: ASC 815-10-50-4I</p>
	<p>Note: The disclosures required below do not apply to an embedded derivative feature related to the transfer of credit risk that is only in the form of subordination of one financial instrument to another, as described in paragraph 815-15-15-9.</p> <p>References: ASC 815-10-50-4K</p>
	<p>For each statement of financial position presented, the seller of a credit derivative shall disclose all of the following information for each credit derivative, or each group of similar credit derivatives, even if the likelihood of the seller's having to make any payments under the credit derivative is remote:</p> <p>References: ASC 815-10-50-4K</p>
	<p>The nature of the credit derivative, including all of the following:</p> <p>References: ASC 815-10-50-4K(a)</p>
	<p>The approximate term of the credit derivative</p> <p>References: ASC 815-10-50-4K(a)</p>
	<p>The reasons for entering into the credit derivative</p> <p>References: ASC 815-10-50-4K(a)</p>

Line Item(s)	Response
	<p>The events or circumstances that would require the seller to perform under the credit derivative</p> <p>References: <u>ASC 815-10-50-4K(a)</u>.</p>
	<p>The current status (that is, as of the date of the statement of financial position) of the payment/performance risk of the credit derivative, which could be based on either recently issued external credit ratings or current internal groupings used by the seller to manage its risk</p> <p>References: <u>ASC 815-10-50-4K(a)</u>.</p>
	<p>If the entity uses internal groupings to assess performance risk, disclose how those groupings are determined and used for managing risk</p> <p>References: <u>ASC 815-10-50-4K(a)</u>.</p>
	<p>Disclose all of the following information about the maximum potential amount of future payments under the credit derivative:</p> <p>References: <u>ASC 815-10-50-4K(b)</u>.</p>
	<p>The maximum potential amount of future payments (undiscounted) that the seller could be required to make under the credit derivative, which shall not be reduced by the effect of any amounts that may possibly be recovered under recourse or collateralization provisions in the credit derivative</p> <p>References: <u>ASC 815-10-50-4K(b)</u>.</p>
	<p>The fact that the terms of the credit derivative provide for no limitation to the maximum potential future payments under the contract, if applicable</p> <p>References: <u>ASC 815-10-50-4K(b)</u>.</p>
	<p>If the seller is unable to develop an estimate of the maximum potential amount of future payments under the credit derivative, the reasons why it cannot estimate the maximum potential amount</p> <p>References: <u>ASC 815-10-50-4K(b)</u>.</p>
	<p>The fair value of the credit derivative as of the date of the statement of financial position</p> <p>References: <u>ASC 815-10-50-4K(c)</u>.</p>

Line Item(s)	Response
	<p>The nature of any recourse provisions that would enable the seller to recover from third parties any of the amounts paid under the credit derivative</p> <p>References: <u>ASC 815-10-50-4K(d)</u>.</p>
	<p>The nature of any assets held either as collateral or by third parties that, upon the occurrence of any specified triggering event or condition under the credit derivative, the seller can obtain and liquidate to recover all or a portion of the amounts paid under the credit derivative</p> <p>References: <u>ASC 815-10-50-4K(e)</u>.</p>
	<p>If estimable, the approximate extent to which the proceeds from liquidation of assets held either as collateral or by third parties would be expected to cover the maximum potential amount of future payments under the credit derivative. In its estimate of potential recoveries, the seller of credit protection shall consider the effect of any purchased credit protection with identical underlying(s)</p> <p>References: <u>ASC 815-10-50-4K(f)</u>.</p>
	<p>For hybrid instruments that have embedded credit derivatives, the seller of the embedded credit derivative shall disclose the information described in 815-10-50-4K for the entire hybrid instrument, not just the embedded credit derivative.</p> <p>References: <u>ASC 815-10-50-4L</u></p>
	<p>Note: SEC staff has indicated that for credit default swaps, the use of current credit default spreads on the referenced issuers is acceptable for the above disclosures. Preparers should ensure there is enough narrative description of the meaning of the swap spreads to understand the information conveyed.</p>
	<p>Note: SEC staff has also observed that tabular disclosure of credit derivatives should make it clear to the typical reader which are purchased derivatives and which are written derivatives, as some disclosures have only differentiated between the two through addition of credit status information (e.g., credit ratings) for individual written derivatives.</p>
Qualitative Disclosures	

Line Item(s)	Response
	<p>Note: Qualitative disclosures about an entity's objectives and strategies for using derivative instruments may be more meaningful if such objectives and strategies are described in the context of an entity's overall risk exposures (specifically related to risks from interest rates, foreign exchange, commodity price, credit and equity price). Additional qualitative disclosures, if made, should include a discussion of those exposures even though the entity does not manage some of those exposures by using derivative instruments. An entity is encouraged, but not required, to provide such additional qualitative disclosures about those risks and how they are managed.</p> <p>References: ASC 815-10-50-5</p>
<p>Reclassification of Embedded Conversion Option</p> <p>References: ASC 815-15-50-3</p>	
	<p>An issuer shall disclose both of the following for the period in which an embedded conversion option previously accounted for as a derivative instrument under ASC 815-15 no longer meets the separation criteria under ASC 815-15:</p> <p>References: ASC 815-15-50-3</p>
<p>A description of the principal changes causing the embedded conversion option to no longer require bifurcation under ASC 815-15</p> <p>References: ASC 815-15-50-3</p>	
<p>The amount of the liability for the conversion option reclassified to stockholders' equity.</p> <p>References: ASC 815-15-50-3</p>	
<p>Fair Value Hedges</p>	
<p>For fair-value hedges (i.e., derivative instruments - as well as nonderivative instruments that may give rise to foreign- currency transaction gains or losses - that have been designated as and have qualified as fair-value hedging instruments) and for the related hedged items, disclose:</p> <p>References: ASC 815-25-50-1</p>	

Line Item(s)	Response
<p>The net gain or loss recognized in earnings during the reporting period representing both of the following:</p> <p>References: <u>ASC 815-25-50-1</u></p>	
<p>The amount of the hedges' ineffectiveness</p> <p>References: <u>ASC 815-25-50-1</u></p>	
<p>The component of the derivative instruments' gain or loss, should there be any, that is excluded from the assessment of hedge effectiveness</p> <p>References: <u>ASC 815-25-50-1</u></p>	
<p>The amount of net gain or loss recognized in earnings when a hedged firm commitment no longer qualifies as a fair value hedge</p> <p>References: <u>ASC 815-25-50-1</u></p>	
Cash Flow Hedges	
<p>For every period for which a statement of financial position and a statement of financial performance is presented, disclose all of the following for derivative instruments that have been designated and have qualified as cash flow hedging instruments and for the related hedged transactions:</p> <p>References: <u>ASC 815-30-50-1</u></p>	
<p>A description of the transactions or other events that will result in the reclassification into earnings of gains and losses that are reported in accumulated other comprehensive income</p> <p>References: <u>ASC 815-30-50-1(b)</u></p>	
<p>The estimated net amount of the existing gains or losses that are reported in accumulated other comprehensive income at the reporting date that is expected to be reclassified into earnings within the next 12 months This amount could be greater or less than the net amount reported in accumulated other comprehensive income.</p> <p>References: <u>ASC 815-30-50-1(c)</u> <u>ASC 815-30-50-4</u></p>	

Line Item(s)	Response
<p>The maximum length of time over which the entity is hedging its exposure to the variability in future cash flows for forecasted transactions excluding those forecasted transactions related to the payment of variable interest on existing financial instruments</p> <p>References: ASC 815-30-50-1(d)</p>	
<p>The amount of gains and losses reclassified into earnings as a result of the discontinuance of cash flow hedges because it is probable that the original forecasted transactions will not occur</p> <p>References: ASC 815-30-50-1(e)</p>	
<p>As part of the disclosures of accumulated other comprehensive income, pursuant to ASC 220-10-45-14 through 45-14A, an entity shall separately disclose all of the following:</p> <p>References: ASC 815-30-50-2</p>	
<p>The beginning and ending accumulated derivative gain or loss</p> <p>References: ASC 815-30-50-2</p>	
<p>The related net change associated with current-period hedging transactions</p> <p>References: ASC 815-30-50-2</p>	
<p>The net amount of any reclassification into earnings</p> <p>References: ASC 815-30-50-2</p>	
<p>Net Investment Hedges</p>	
<p>The quantitative disclosures about derivative instruments may be more useful, and less likely to be perceived to be out of context or otherwise misunderstood, if similar information is disclosed about other financial instruments or nonfinancial assets and liabilities to which the derivative instruments are related by activity. Accordingly, in those situations, an entity is encouraged, but not required, to present a more complete picture of its activities by disclosing that information.</p> <p>References: ASC 815-35-50-2</p>	
<p>Balance Sheet Offsetting</p>	

Line Item(s)	Response
	<p>Disclose the entity's accounting policy to offset or not offset in accordance with ASC 815-10-45-6</p> <p>References: <u>ASC 815-10-50-7</u></p>
	<p>Disclose the amounts recognized at the end of each reporting period for the right to reclaim cash collateral or the obligation to return cash collateral as follows:</p> <p>References: <u>ASC 815-10-50-8</u></p>
	<p>A reporting entity that has made an accounting policy decision to offset fair value amounts shall separately disclose:</p> <p>References: <u>ASC 815-10-50-8</u></p>
	<p>Amounts recognized for the right to reclaim cash collateral or the obligation to return cash collateral that have been offset against net derivative positions in accordance with ASC 815-10-45-5.</p> <p>References: <u>ASC 815-10-50-8</u></p>
	<p>Amounts recognized for the right to reclaim cash collateral or the obligation to return cash collateral under master netting arrangements that have not been offset against net derivative positions.</p> <p>References: <u>ASC 815-10-50-8</u></p>
	<p>A reporting entity that has made an accounting policy decision to not offset fair value amounts shall separately disclose:</p> <p>References: <u>ASC 815-10-50-8</u></p>
	<p>The amounts recognized for the right to reclaim cash collateral or the obligation to return cash collateral under master netting arrangements.</p> <p>References: <u>ASC 815-10-50-8</u></p>
	<p>Disclose the accounting policy for the premium paid (time value) to acquire an option that is classified as held to maturity or available for sale.</p> <p>References: <u>ASC 815-10-50-9</u></p>
Financial Instrument Disclosures	

The following information about financial instruments as required by Section 825-10-50:

References: [ASC 270-10-50-1\(m\)](#)

Note: The disclosure guidance in this Subsection applies to public business entities, except for the disclosure guidance in paragraphs 825-10-50-20 through 50-23, which applies to all entities.

References: [ASC 825-10-50-2A](#)

Note: For interim reporting periods, the disclosure guidance in paragraphs 825-10-50-20 through 50-23 is optional for those entities that do not meet the definition of a public business entity

References: [ASC 825-10-50-2A](#)

Note: In part, this Subsection requires disclosures about fair value for all financial instruments, whether recognized or not recognized in the statement of financial position, except that the disclosures about fair value prescribed in paragraphs 825-10-50-10 through 50-16 are not required for any of the following: a. Employers' and plans' obligations for pension benefits, other postretirement benefits including health care and life insurance benefits, postemployment benefits, employee stock option and stock purchase plans, and other forms of deferred compensation arrangements (see Topics 710, 712, 715, 718, and 960) b. Substantively extinguished debt subject to the disclosure requirements of Subtopic 405-20 c. Insurance contracts, other than financial guarantees (including financial guarantee insurance contracts within the scope of Topic 944) and investment contracts, as discussed in Subtopic 944-20 d. Lease contracts as defined in Topic 840 (a contingent obligation arising out of a cancelled lease and a guarantee of a third-party lease obligation are not lease contracts and are subject to the disclosure requirements in this Subsection) e. Warranty obligations (see Topic 450 and the Product Warranties Subsections of Topic 460) f. Unconditional purchase obligations as defined in paragraph 440-10-50-2 g. Investments accounted for under the equity method in accordance with the requirements of Topic 323 h. Noncontrolling interests and equity investments in consolidated subsidiaries (see Topic 810) i. Equity instruments issued by the entity and classified in stockholders' equity in the statement of financial position (see Topic 505) j. Receive-variable, pay-fixed interest rate swaps for which the simplified hedge accounting approach is applied (see Topic 815) k. Fully benefit-responsive investment contracts held by an employee benefit plan. l. Investments in equity securities accounted for under the measurement guidance for equity securities without readily determinable fair values (see Topic 321) m. Trade receivables and payables due in one year or less n. Deposit liabilities with no defined or contractual maturities. o. Liabilities resulting from the sale of prepaid stored-value products within the scope of paragraph 405-20-40-3.

References: [ASC 825-10-50-8](#)

Line Item(s)	Response
	<p>A reporting entity shall disclose either in the body of the financial statement or in the accompanying notes, the fair value of financial statement and the level of the fair value hierarchy within which the fair value measurements are categorized in the entirety (Level 1, 2, or 3).</p> <p>References: ASC 825-10-50-10</p>
	<p>Note: For financial instruments recognized at fair value in the statement of financial position, the disclosure requirements of Topic 820 also apply.</p> <p>References: ASC 825-10-50-10</p>
	<p>Fair value disclosed in the notes shall be presented together with the related carrying amount in a form that clarifies both of the following:</p> <p>References: ASC 825-10-50-11</p>
	<p>Whether the fair value and carrying amount represent assets or liabilities</p> <p>References: ASC 825-10-50-11</p>
	<p>How the carrying amounts relate to what is reported in the statement of financial position.</p> <p>References: ASC 825-10-50-11</p>
	<p>If the fair value of financial instruments is disclosed in more than a single note, one of the notes shall include a summary table. The summary table shall contain the fair value and related carrying amounts and cross-references to the location(s) of the remaining disclosures required by this Section.</p> <p>References: ASC 825-10-50-12</p>
	<p>In disclosing the fair value of a financial instrument, an entity shall not net that fair value with the fair value of other financial instruments—even if those financial instruments are of the same class or are otherwise considered to be related (for example, by a risk management strategy)—except to the extent that the offsetting of carrying amounts in the statement of financial position is permitted under either of the following:</p> <p>References: ASC 825-10-50-15</p>

Line Item(s)	Response
<p>The general principle in paragraph 210-20-45-1</p> <p>References: ASC 825-10-50-15</p>	
<p>The exceptions for master netting arrangements in paragraph 815-10-45-5 and for amounts related to certain repurchase and reverse repurchase agreements in paragraphs 210-20-45-11 through 45-17.</p> <p>References: ASC 825-10-50-15</p>	
<p>Note: The requirements of ASC 825-10-50-20 through 21 are applicable for all financial instruments except for the following items: 1) Employers' and plans' obligations for pension benefits, other postretirement benefits (including health care and life insurance benefits), postemployment benefits, employee stock option and stock purchase plans, and other forms of deferred compensation arrangements 2) Insurance contracts (except for reinsurance receivables and prepaid reinsurance premiums), other than financial guarantees and investment contracts under Subtopic 944-20 3) Warranty obligations 4) Unconditional purchase obligations 5) Financial instruments of a pension plan (including plan assets) if subject to Topic 715 Financial instruments of a pension plan, other than the obligations for pension benefits, if subject to the accounting and reporting requirements of Topic 960, are subject to the requirements of paragraphs 825-10-50-20 through 50-21.</p>	
<p>Except as indicated above, an entity shall disclose all significant concentrations of credit risk arising from all financial instruments, whether from an individual counterparty or groups of counterparties.</p> <p>References: ASC 825-10-50-20</p>	
<p>Except as indicated in the note above, an entity shall disclose all of the following about each significant concentration:</p> <p>References: ASC 825-10-50-21</p>	
<p>Information about the (shared) activity, region, or economic characteristic that identifies the concentration</p> <p>References: ASC 825-10-50-21</p>	
<p>The maximum amount of loss due to credit risk that, based on the gross fair value of the financial instrument, the entity would incur if parties to the financial instruments that make up the concentration failed completely to perform according to the terms of the contracts and the collateral or other security, if any, for the amount due proved to be of no value to the entity</p> <p>References: ASC 825-10-50-21</p>	

Line Item(s)	Response
<p>With respect to collateral, disclose all of the following:</p> <p>References: <u>ASC 825-10-50-21</u></p>	
<p>The entity's policy of requiring collateral or other security to support financial instruments subject to credit risk</p> <p>References: <u>ASC 825-10-50-21</u></p>	
<p>Information about the entity's access to that collateral or other security</p> <p>References: <u>ASC 825-10-50-21</u></p>	
<p>The nature and a brief description of the collateral or other security supporting those financial instruments.</p> <p>References: <u>ASC 825-10-50-21</u></p>	
<p>With respect to master netting arrangements, disclose all of the following:</p> <p>References: <u>ASC 825-10-50-21</u></p>	
<p>The entity's policy of entering into master netting arrangements to mitigate the credit risk of financial instruments</p> <p>References: <u>ASC 825-10-50-21</u></p>	
<p>Information about the arrangements for which the entity is a party</p> <p>References: <u>ASC 825-10-50-21</u></p>	
<p>A brief description of the terms of those arrangements, including the extent to which they would reduce the entity's maximum amount of loss due to credit risk.</p> <p>References: <u>ASC 825-10-50-21</u></p>	

Line Item(s)	Response
	<p>For items measured at fair value under the option in this Subtopic and the option in paragraph 815-15-25-4, an entity shall disclose the items described in paragraphs 825-10-50-28 through 50-32 in both interim and annual financial statements. Those disclosures are not required for securities classified as trading securities under Topic 320, life settlement contracts measured at fair value pursuant to Subtopic 325-30, or servicing rights measured at fair value pursuant to Subtopic 860-50. Those Subtopics include disclosure requirements not affected by this Subtopic.</p> <p>References: <u>ASC 825-10-50-25</u></p>
	<p>As of each date for which a statement of financial position is presented, disclose:</p> <p>References: <u>ASC 825-10-50-28</u></p>
	<p>Management's reasons for electing a fair value option for each eligible item or group of similar eligible items</p> <p>References: <u>ASC 825-10-50-28(a)</u>.</p>
	<p>If the fair value option is elected for some but not all eligible items within a group of similar eligible items, disclose both of the following:</p> <p>References: <u>ASC 825-10-50-28(b)</u>.</p>
	<p>A description of those similar items and the reasons for partial election, and</p> <p>References: <u>ASC 825-10-50-28(b)(1)</u></p>
	<p>Information to enable users to understand how the group of similar items relates to individual line items on the statement of financial position.</p> <p>References: <u>ASC 825-10-50-28(b)(2)</u></p>
	<p>For each line item in the statement of financial position that includes an item or items for which the fair value option has been elected, disclose both of the following:</p> <p>References: <u>ASC 825-10-50-28(c)</u></p>

Line Item(s)	Response
	<p>Information to enable users to understand how each line item in the statement of financial position relates to major classes of assets and liabilities presented in accordance with the fair value disclosure requirements of Topic 820.</p> <p>References: <u>ASC 825-10-50-28(c)(1)</u>.</p>
	<p>The aggregate carrying amount of items included in each line item in the statement of financial position that are not eligible for the fair value option, if any.</p> <p>References: <u>ASC 825-10-50-28(c)(2)</u>.</p>
	<p>The difference between the aggregate fair value and the aggregate unpaid principal balance of each of the following:</p> <p>References: <u>ASC 825-10-50-28(d)</u>.</p>
	<p>Loans and long-term receivables (other than securities subject to Topic 320) that have contractual principal amounts and for which the fair value option has been elected, and</p> <p>References: <u>ASC 825-10-50-28(d)(1)</u>.</p>
	<p>Long-term debt instruments that have contractual principal amounts and for which the fair value option has been elected.</p> <p>References: <u>ASC 825-10-50-28(d)(2)</u>.</p>
	<p>For loans held as assets for which the fair value option has been elected, disclose all of the following:</p> <p>References: <u>ASC 825-10-50-28(e)</u>.</p>
	<p>The aggregate fair value of loans that are 90 days or more past due.</p> <p>References: <u>ASC 825-10-50-28(e)(1)</u>.</p>
	<p>The aggregate fair value of loans in nonaccrual status, if the entity's policy is to recognize interest income separately from other changes in fair value</p> <p>References: <u>ASC 825-10-50-28(e)(2)</u>.</p>

Line Item(s)	Response
	<p>The difference between the aggregate fair value and the aggregate unpaid principal balance for loans that are 90 days or more past due, in nonaccrual status, or both.</p> <p>References: <u>ASC 825-10-50-28(e)(3)</u></p>
	<p>For investments (including investments in common stock, investments in in-substance common stock, and other investments including partnerships, and certain limited liability corporations) that would have been accounted for under the equity method if the entity had not chosen to apply the fair value option, disclose the information required by ASC 323-10-50-3 (excluding the disclosures in ASC 323-10-50-3(a) (3); (b) and (d)).</p> <p>References: <u>ASC 825-10-50-28(f)</u></p>
	<p>For each period for which an income statement is presented, entities shall disclose all of the following about items for which the fair value option has been elected:</p> <p>References: <u>ASC 825-10-50-30</u></p>
	<p>For each line item in the statement of financial position, the amounts of gains and losses from fair value changes included in earnings during the period and</p> <p>References: <u>ASC 825-10-50-30(a)</u></p>
	<p>The line in the income statement where those gains and losses are reported.</p> <p>References: <u>ASC 825-10-50-30(a)</u></p>
	<p>Note: An entity may meet this requirement by disclosing amounts of gains and losses that include amounts of gains and losses for other items measured at fair value, such as items required to be measured at fair value.</p> <p>References: <u>ASC 825-10-50-30(b)</u></p>
	<p>A description of how interest and dividends are measured and where they are reported in the income statement.</p> <p>References: <u>ASC 825-10-50-30(b)</u></p>

Line Item(s)	Response
<p>For loans and other receivables held as assets, disclose both of the following:</p> <p>References: <u>ASC 825-10-50-30(c)</u>.</p>	
<p>The estimated amount of gains or losses included in earnings during the period attributable to changes in instrument-specific credit risk, and</p> <p>References: <u>ASC 825-10-50-30(c)(1)</u>.</p>	
<p>How the gains or losses attributable to changes in instrument-specific credit risk were determined.</p> <p>References: <u>ASC 825-10-50-30(c)(2)</u>.</p>	
<p>How the gains and losses attributable to changes in instrument-specific credit risk were determined.</p> <p>References: <u>ASC 825-10-50-30(d)(3)</u>.</p>	
<p>For liabilities, disclose all of the following about the effects of the instrument-specific credit and changes in it:</p> <p>References: <u>ASC 825-10-50-30(d)</u>.</p>	
<p>The amount of change, during the period and cumulatively, of the fair value of the liability that is attributable to changes in the instrument-specific credit risk</p> <p>References: <u>ASC 825-10-50-30(d)(1)</u>.</p>	
<p>How the gains and losses attributable to changes in instrument-specific credit risk were determined.</p> <p>References: <u>ASC 825-10-50-30(d)(3)</u>.</p>	
<p>If a liability is settled during the period, the amount, if any, recognized in other comprehensive income that was recognized in net income at settlement</p> <p>References: <u>ASC 825-10-50-30(d)(4)</u>.</p>	

Line Item(s)	Response
<p>Note: An entity is not required to provide the quantitative disclosure about significant unobservable inputs used in fair value measurements categorized within Level 3 of the fair value hierarchy required by paragraph 820-10-50-2(bbb).</p> <p>References: <u>ASC 825-10-50-31</u></p>	
<p>If an entity elects the fair value option at the time one of the election events detailed in paragraphs ASC 825-10-25-4(d) through (e) occurs, disclose both of the following in the financial statements for the period of the election:</p> <p>References: <u>ASC 825-10-50-32</u></p>	
<p>Qualitative information about the nature of the event</p> <p>References: <u>ASC 825-10-50-32(a)</u></p>	
<p>Quantitative information by line item in the statement of financial position indicating which line items in the income statement include the effect on earnings of initially electing the fair value option for an item.</p> <p>References: <u>ASC 825-10-50-32(b)</u></p>	
<p>Financial Services - Depository and Lending</p>	
<p>For guidance related to depository and lending financial institutions, all of the following information should be disclosed for financial instruments with off-balance-sheet credit risk, except for those instruments within the scope of Topic 815:</p> <p>References: <u>ASC 942-825-50-1</u></p>	
<p>The face or contract amount</p> <p>References: <u>ASC 942-825-50-1(a)</u></p>	
<p>The nature and terms, including, at a minimum, a discussion of the following:</p> <p>References: <u>ASC 942-825-50-1(b)</u></p>	
<p>Credit and market risk of those instruments</p> <p>References: <u>ASC 942-825-50-1(b)(1)</u></p>	

Line Item(s)	Response
<p>Cash requirements of those instruments</p> <p>References: <u>ASC 942-825-50-1(b)(2)</u></p>	
<p>Related accounting policy pursuant to Subtopic 235-10.</p> <p>References: <u>ASC 942-825-50-1(b)(3)</u></p>	
<p>The entity's policy for requiring collateral or other security to support financial instruments subject to credit risk, information about the entity's access to that collateral or other security, and the nature and a brief description of the collateral or other security supporting those financial instruments.</p> <p>References: <u>ASC 942-825-50-1(c)</u></p>	
<p>Financial Services - Insurance</p>	
<p>An insurance entity shall disclose the carrying amount of securities deposited by insurance subsidiaries with state regulatory authorities.</p> <p>References: <u>ASC 944-825-50-1A</u></p>	
<p>Under the provisions of Section 825-10-50, a ceding entity should disclose concentrations of credit risk associated with both of the following:</p> <p>References: <u>ASC 944-825-50-1</u></p>	
<p>Reinsurance recoverables</p> <p>References: <u>ASC 944-825-50-1(a)</u></p>	
<p>Prepaid reinsurance premiums.</p> <p>References: <u>ASC 944-825-50-1(b)</u></p>	
<p>Under the provisions of Section 825-10-50, a ceding entity should disclose concentrations of credit risk associated with both of the following:</p> <p>References: <u>ASC 944-825-50-1B</u></p>	

Line Item(s)	Response
<p>Reinsurance recoverables</p> <p>References: ASC 944-825-50-1B</p>	
<p>Prepaid reinsurance premiums.</p> <p>References: ASC 944-825-50-1B</p>	
<p>Note: Even if a ceding entity does not have a significant concentration of credit risk with a single reinsurer, concentration of credit risk disclosures may be required under the provisions of Section 825-10-50.</p> <p>References: ASC 944-825-50-2</p>	
<p>If a ceding entity is aware that reinsured risks have been retroceded to a diverse group of retrocessionaires, disclosures about concentrations of credit risk still shall be made under Section 825-10-50 because the assuming entity's rights under the retrocessions generally are not available to the ceding entity to mitigate its credit risk. That is, the ceding entity's concentration of credit risk from the assuming entity is unchanged.</p> <p>References: ASC 944-825-50-3</p>	
<p>Disclosures for Repurchase Agreements, Securities Lending Transactions, and Repurchase-to-Maturity Transactions</p>	
<p>To provide an understanding of the nature and risks of short-term collateralized financing obtained through repurchase agreements, securities lending transactions, and repurchase-to-maturity transactions, that are accounted for as secured borrowings at the reporting date, an entity shall disclose the following information for each interim and annual period about the collateral pledged and the associated risks to which the transferor continues to be exposed after the transfer:</p> <p>References: ASC 860-30-50-7</p>	
<p>A disaggregation of the gross obligation by the class of collateral pledged. An entity shall determine the appropriate level of disaggregation and classes to be presented on the basis of the nature, characteristics, and risks of the collateral pledged.</p> <p>References: ASC 830-30-50-7</p>	

Line Item(s)	Response
	<p>Total borrowings under those agreements shall be reconciled to the amount of the gross liability for repurchase agreements and securities lending transactions disclosed in accordance with paragraph 210-20-50-3(a) before any adjustments for offsetting. Any difference between the amount of the gross obligation disclosed under this paragraph and the amount disclosed in accordance with paragraph 210-20-50-3(a) shall be presented as reconciling item(s).</p> <p>References: <u>ASC 860-30-50-7</u></p>
	<p>The remaining contractual maturity of the repurchase agreements, securities lending transactions, and repurchase-to-maturity transactions. An entity shall use judgment to determine an appropriate range of maturity intervals that would convey an understanding of the overall maturity profile of the entity's financing agreements.</p> <p>References: <u>ASC 860-30-50-7</u></p>
	<p>A discussion of the potential risks associated with the agreements and related collateral pledged, including obligations arising from a decline in the fair value of the collateral pledged and how those risks are managed.</p> <p>References: <u>ASC 860-30-50-7</u></p>
Investments in Debt and Equity Securities Disclosures	
	<p>The following information about certain investments in debt and equity securities is required to be disclosed under Sections 320-10-50, 321-10-50 and 942-320-50:</p> <p>References: <u>ASC 270-10-50-1(n)</u></p>
Debt Securities	
	<p>For securities classified as available-for-sale, disclose all of the following, by major security type, as of each date for which a statement of financial position is presented:</p> <p>References: <u>ASC 320-10-50-2</u></p>
	<p>Amortized cost basis</p> <p>References: <u>ASC 320-10-50-2</u></p>

Line Item(s)	Response
<p>Aggregate fair value</p> <p>References: <u>ASC 320-10-50-2</u></p>	
<p>The total other-than-temporary impairment recognized in accumulated other comprehensive income</p> <p>References: <u>ASC 320-10-50-2</u></p>	
<p>Total gains for securities with net gains in accumulated other comprehensive income</p> <p>References: <u>ASC 320-10-50-2</u></p>	
<p>Total losses for securities with net losses in accumulated other comprehensive income</p> <p>References: <u>ASC 320-10-50-2</u></p>	
<p>Information about the contractual maturities of those securities as of the date of the most recent statement of financial position presented. Securities not due at a single maturity date, such as mortgage-backed securities, may be disclosed separately rather than allocated over several maturity groupings; if allocated, the basis for allocation also shall be disclosed.</p> <p>References: <u>ASC 320-10-50-2</u></p>	
<p>For securities classified as held-to-maturity, disclose all of the following, by major security type, as of each date for which a statement of financial position is presented:</p> <p>References: <u>ASC 320-10-50-5</u></p>	
<p>Amortized cost basis</p> <p>References: <u>ASC 320-10-50-5(a)</u></p>	
<p>Aggregate fair value</p> <p>References: <u>ASC 320-10-50-5(aa)</u></p>	
<p>Gross unrecognized holding gains</p> <p>References: <u>ASC 320-10-50-5(b)</u></p>	

Line Item(s)	Response
<p>Gross unrecognized holding losses</p> <p>References: <u>ASC 320-10-50-5(c)</u></p>	
<p>Net carrying amount</p> <p>References: <u>ASC 320-10-50-5(d)</u></p>	
<p>The total other-than-temporary impairment recognized in accumulated other comprehensive income</p> <p>References: <u>ASC 320-10-50-5(dd)</u></p>	
<p>Gross gains and losses in accumulated other comprehensive income for any derivatives that hedged the forecasted acquisition of the held-to-maturity securities</p> <p>References: <u>ASC 320-10-50-5(e)</u></p>	
<p>Information about the contractual maturities of those securities as of the date of the most recent statement of financial position presented. Securities not due at a single maturity date, such as mortgage-backed securities, may be disclosed separately rather than allocated over several maturity groupings; if allocated, the basis for allocation also shall be disclosed.</p> <p>References: <u>ASC 320-10-50-5(f)</u></p>	
<p>Note: Maturity information may be combined in appropriate groupings. In complying with this requirement, financial institutions [see paragraph 942-320-50-1] shall disclose the fair value and the net carrying amount (if different from fair value) of debt securities on the basis of at least the following four maturity groupings: Within one year; After one year through five years; After 5 years through 10 years; After 10 years.</p> <p>References: <u>ASC 320-10-50-5(f)</u></p>	
<p>For all investments in an unrealized loss position, including those that fall within the scope of Subtopic 325-40, for which other-than-temporary impairments have not been recognized in earnings (including investments for which a portion of an other-than-temporary impairment has been recognized in other comprehensive income), disclose:</p> <p>References: <u>ASC 320-10-50-6</u></p>	

Line Item(s)	Response
<p>As of each date for which a statement of financial position is presented, quantitative information, aggregated by category of investment—each major security type that the entity discloses in accordance with this Subtopic—in tabular form</p> <p>References: <u>ASC 320-10-50-6(a)</u></p>	
<p>The aggregate related fair value of investments with unrealized losses, and</p> <p>References: <u>ASC 320-10-50-6(a)(1)</u></p>	
<p>The aggregate amount of unrealized losses (that is, the amount by which amortized cost basis exceeds fair value).</p> <p>References: <u>ASC 320-10-50-6(a)(2)</u></p>	
<p>The investments included in the tabular disclosure shall be segregated by those investments that have been in a continuous unrealized loss position for less than 12 months and those that have been in a continuous unrealized loss position for 12 months or longer.</p> <p>References: <u>ASC 320-10-50-7</u></p>	
<p>As of the date of the most recent statement of financial position, additional information, in narrative form, that provides sufficient information to allow financial statement users to understand the quantitative disclosures and the information that the investor considered (both positive and negative) in reaching the conclusion that the impairments are not other than temporary. The disclosures required may be aggregated by investment categories, but individually significant unrealized losses generally shall not be aggregated. This disclosure could include:</p> <p>References: <u>ASC 320-10-50-6(b)</u></p>	
<p>The nature of the investment(s).</p> <p>References: <u>ASC 320-10-50-6(b)(1)</u></p>	
<p>The cause(s) of the impairment(s).</p> <p>References: <u>ASC 320-10-50-6(b)(2)</u></p>	

Line Item(s)	Response
<p>The number of investment positions that are in an unrealized loss position.</p> <p>References: <u>ASC 320-10-50-6(b)(3)</u>.</p>	
<p>The severity and duration of the impairment(s).</p> <p>References: <u>ASC 320-10-50-6(b)(4)</u>.</p>	
<p>Other evidence considered by the investor in reaching its conclusion that the investment is not other-than-temporarily impaired, including, for example, any of the following:</p> <p>References: <u>ASC 320-10-50-6(b)(5)</u>.</p>	
<p>Performance indicators of the underlying assets in the security, including any of the following: (1) Default rates (2) Delinquency rates (3) Percentage of nonperforming assets</p> <p>References: <u>ASC 320-10-50-6(b)(5)(i)</u>.</p>	
<p>Loan-to-collateral-value ratios</p> <p>References: <u>ASC 320-10-50-6(b)(5)(ii)</u>.</p>	
<p>Third-party guarantees</p> <p>References: <u>ASC 320-10-50-6(b)(5)(iii)</u>.</p>	
<p>Current levels of subordination</p> <p>References: <u>ASC 320-10-50-6(b)(5)(iv)</u>.</p>	
<p>Vintage</p> <p>References: <u>ASC 320-10-50-6(b)(5)(v)</u>.</p>	
<p>Geographic concentration</p> <p>References: <u>ASC 320-10-50-6(b)(5)(vi)</u>.</p>	

Line Item(s)	Response
<p>Industry analyst reports</p> <p>References: <u>ASC 320-10-50-6(b)(5)(vii)</u>.</p>	
<p>Sector credit ratings</p> <p>References: <u>ASC 320-10-50-6(b)(5)(viii)</u>.</p>	
<p>Volatility of the security's fair value</p> <p>References: <u>ASC 320-10-50-6(b)(5)(ix)</u>.</p>	
<p>Any other information that the investor considers relevant.</p> <p>References: <u>ASC 320-10-50-6(b)(5)(x)</u>.</p>	
<p>For periods in which other-than-temporary impairment of a debt security is recognized and only the amount related to a credit loss was recognized in earnings, an entity shall disclose, by major security type, the methodology and significant inputs used to measure the amount related to credit loss. Examples of significant inputs include, but are not limited to, all of the following:</p> <p>References: <u>ASC 320-10-50-8A</u></p>	
<p>Performance indicators of the underlying assets in the security, including all of the following: (1) Default rates (2) Delinquency rates (3)Percentage of nonperforming assets</p> <p>References: <u>ASC 320-10-50-8A(a)</u></p>	
<p>Loan-to-collateral-value ratios</p> <p>References: <u>ASC 320-10-50-8A(b)</u>.</p>	
<p>Third-party guarantees</p> <p>References: <u>ASC 320-10-50-8A(c)</u></p>	
<p>Current levels of subordination</p> <p>References: <u>ASC 320-10-50-8A(d)</u>.</p>	

Line Item(s)	Response
<p>Vintage</p> <p>References: <u>ASC 320-10-50-8A(e)</u>.</p>	
<p>Geographic concentration</p> <p>References: <u>ASC 320-10-50-8A(f)</u>.</p>	
<p>Credit ratings</p> <p>References: <u>ASC 320-10-50-8A(g)</u>.</p>	
<p>For each reporting period presented, disclose a tabular rollforward of the amount related to credit losses recognized in earnings including, at a minimum:</p> <p>References: <u>ASC 320-10-50-8B</u></p>	
<p>The beginning balance of the amount related to credit losses on debt securities held at the beginning of the period for which a portion of an other-than-temporary impairment was recognized in other comprehensive income.</p> <p>References: <u>ASC 320-10-50-8B(a)</u>.</p>	
<p>Additions for the amount related to the credit loss for which an other-than-temporary impairment was not previously recognized.</p> <p>References: <u>ASC 320-10-50-8B(b)</u>.</p>	
<p>Reductions for securities sold during the period (realized).</p> <p>References: <u>ASC 320-10-50-8B(c)</u>.</p>	
<p>Reductions for securities for which the amount previously recognized in other comprehensive income was recognized in earnings because the entity intends to sell the security or more likely than not will be required to sell the security before recovery of its amortized cost basis.</p> <p>References: <u>ASC 320-10-50-8B(d)</u>.</p>	

Line Item(s)	Response
<p>Additional increases to the amount related to the credit loss for which an other-than-temporary impairment was previously recognized when the entity does not intend to sell the security and it is not more likely than not that the entity will be required to sell the security before recovery of its amortized cost basis.</p> <p>References: <u>ASC 320-10-50-8B(e)</u></p>	
<p>Reductions for increases in cash flows expected to be collected that are recognized over the remaining life of the security.</p> <p>References: <u>ASC 320-10-50-8B(f)</u></p>	
<p>The ending balance of the amount related to credit losses on debt securities held at the end of the period for which a portion of an other-than-temporary impairment was recognized in other comprehensive income.</p> <p>References: <u>ASC 320-10-50-8B(g)</u></p>	
<p>For each period for which the results of operations are presented, an entity shall disclose all of the following:</p> <p>References: <u>ASC 320-10-50-9</u></p>	
<p>The proceeds from sales of available-for-sale securities and the gross realized gains and gross realized losses that have been included in earnings as a result of those sales.</p> <p>References: <u>ASC 320-10-50-9(a)</u></p>	
<p>The basis on which the cost of a security sold or the amount reclassified out of accumulated other comprehensive income into earnings was determined (i.e., specific identification, average cost, or other method used).</p> <p>References: <u>ASC 320-10-50-9(b)</u></p>	
<p>The gross gains and gross losses included in earnings from transfers of securities from the available-for-sale category into the trading category.</p> <p>References: <u>ASC 320-10-50-9(c)</u></p>	

Line Item(s)	Response
	<p>The amount of the net unrealized holding gain or loss on available-for-sale securities for the period that has been included in accumulated other comprehensive income and the amount of gains and losses reclassified out of accumulated other comprehensive income into earnings for the period.</p> <p>References: <u>ASC 320-10-50-9(d)</u></p>
	<p>The portion of trading gains and losses for the period that relates to trading securities still held at the reporting date.</p> <p>References: <u>ASC 320-10-50-9(e)</u></p>
	<p>For any sales of or transfers from securities classified as held-to-maturity, disclose all of the following in the notes to the financial statements for each period for which the results of operations are presented:</p> <p>References: <u>ASC 320-10-50-10</u></p>
	<p>The net carrying amount of the sold or transferred security.</p> <p>References: <u>ASC 320-10-50-10(a)</u></p>
	<p>The net gain or loss in accumulated other comprehensive income for any derivative that hedged the forecasted acquisition of the held-to-maturity security and the related realized or unrealized gain or loss.</p> <p>References: <u>ASC 320-10-50-10(b)</u></p>
	<p>The circumstances leading to the decision to sell or transfer the security. (Such sales or transfers should be rare, except for sales and transfers due to the changes in circumstances identified in paragraph 320-10-25-6(a) through (f).)</p> <p>References: <u>ASC 320-10-50-10(d)</u></p>
Equity Securities	
	<p>An entity that applies the guidance in paragraph 321-10-35-2 for equity securities without readily determinable fair values shall disclose all of the following:</p> <p>References: <u>ASC 321-10-50-3</u></p>

Line Item(s)	Response
<p>The carrying amount of investments without readily determinable fair values</p> <p>References: <u>ASC 321-10-50-3(a)</u></p>	
<p>The amount of impairments and downward adjustments, if any, both annual and cumulative</p> <p>References: <u>ASC 321-10-50-3(b)</u></p>	
<p>The amount of upward adjustments, if any, both annual and cumulative</p> <p>References: <u>ASC 321-10-50-3(c)</u></p>	
<p>As of the date of the most recent statement of financial position, additional information (in narrative form) that is sufficient to permit financial statement users to understand the quantitative disclosures and the information that the entity considered in reaching the carrying amounts and upward or downward adjustments resulting from observable price changes.</p> <p>References: <u>ASC 321-10-50-3(d)</u></p>	
<p>For each period for which the results of operations are presented, an entity shall disclose the portion of unrealized gains and losses for the period that relates to equity securities still held at the reporting date. The format of the disclosure is detailed in ASC 321-10-50-4.</p> <p>References: <u>ASC 321-10-50-4</u></p>	
<p>For depository and lending financial services entities, the following information is required to be disclosed:</p>	
<p>In complying with the overall disclosure requirements for debt and equity securities, financial institutions (which includes banks, savings and loan associations, savings banks, credit unions, finance companies, and insurance companies) shall include in their disclosures, all of the following major security types:</p> <p>References: <u>ASC 942-320-50-2</u></p>	
<p>Equity securities, segregated by any one of the following: (1) Industry type (2) Entity size (3) Investment objective.</p> <p>References: <u>ASC 942-320-50-2(a)</u></p>	

Line Item(s)	Response
<p>Debt securities issued by the U.S. Treasury and other U.S. government corporations and agencies</p> <p>References: <u>ASC 942-320-50-2(b)</u>.</p>	
<p>Debt securities issued by states of the United States and political subdivisions of the states</p> <p>References: <u>ASC 942-320-50-2(c)</u>.</p>	
<p>Debt securities issued by foreign governments</p> <p>References: <u>ASC 942-320-50-2(d)</u>.</p>	
<p>Corporate debt securities</p> <p>References: <u>ASC 942-320-50-2(e)</u>.</p>	
<p>Residential mortgage-backed securities</p> <p>References: <u>ASC 942-320-50-2(f)</u>.</p>	
<p>Commercial mortgage-backed securities</p> <p>References: <u>ASC 942-320-50-2(ff)</u>.</p>	
<p>Collateralized debt obligations</p> <p>References: <u>ASC 942-320-50-2(fff)</u>.</p>	
<p>Other debt obligations.</p> <p>References: <u>ASC 942-320-50-2(g)</u>.</p>	
<p>Investments in mutual funds that invest only in U.S. government debt securities may be shown separately rather than grouped with other equity securities in the disclosures by major security type required by paragraph 942-320-50-2.</p> <p>References: <u>ASC 942-320-50-2A</u></p>	

Line Item(s)	Response
	<p>Financial institutions shall disclose the fair value and the net carrying amount (if different from fair value) of debt securities based on at least 4 maturity groupings: (1) Within 1 year (2) After 1 year through 5 years (3) After 5 years through 10 years (4) After 10 years.</p> <p>References: <u>ASC 942-320-50-3</u></p>
	<p>The carrying amount of investment assets that serve as collateral to secure public funds, securities sold under repurchase agreements, and other borrowings, that are not otherwise disclosed under Topic 860, shall be disclosed in the notes to financial statements.</p> <p>References: <u>ASC 942-320-50-4</u></p>
	<p>The notes to financial statements shall include an explanation of the institution's accounting policy for securities, including the basis for classification.</p> <p>References: <u>ASC 942-320-50-5</u></p>
	<p>The information about other-than-temporary impairments as required by Sections 320-10-50, 325-20-50, and 958-320-50 and impairments as required by Section 321-10-50.</p> <p>References: <u>ASC 270-10-50-1(o)</u></p>
Financing Receivables	
	<p>Note: All of the following information about the credit quality of financing receivables and the allowance for credit losses determined in accordance with the provisions of Topic 310 is required to be disclosed.</p> <p>References: <u>ASC 270-10-50-1(p)</u></p>
	<p>Nonaccrual and past due financing receivables (see paragraphs 310-10-50-5A through 50-7B below)</p> <p>References: <u>ASC 270-10-50-1(p)(1)</u></p> <p><u>FSP 29.4.4</u></p>
	<p>Note: the guidance in subparagraphs below does not apply to loans acquired with deteriorated credit quality (accounted for under Subtopic 310-30).</p> <p>References: <u>ASC 310-10-50-5A</u></p>

Line Item(s)	Response
	<p>Note: the guidance in sub paragraphs below (310-10-50-6 through 50-7A) shall be provided by class of financing receivable except for the following financing receivables: a. Receivables measured at fair value with changes in fair value reported in earnings b. Receivables measured at lower of cost or fair value c. Trade accounts receivable, except for credit card receivables, that have both of the following characteristics: 1. They have a contractual maturity of one year or less. 2. They arose from the sale of goods or services. d. Participant loans in defined contribution pension plans.</p> <p>References: <u>ASC 310-10-50-5B</u></p>
	<p>An entity's summary of significant accounting policies for financing receivables shall include all of the following:</p> <p>References: <u>ASC 310-10-50-6</u></p>
	<p>The policy for placing financing receivables, if applicable, on nonaccrual status (or discontinuing accrual of interest),</p> <p>References: <u>ASC 310-10-50-6(a)</u></p>
	<p>The policy for recording payments received on nonaccrual financing receivables, if applicable,</p> <p>References: <u>ASC 310-10-50-6(b)</u></p>
	<p>The policy for resuming accrual of interest</p> <p>References: <u>ASC 310-10-50-6(c)</u></p>
	<p>The policy for determining past due or delinquency status.</p> <p>References: <u>ASC 310-10-50-6(e)</u></p>
	<p>Provide both of the following disclosures related to nonaccrual and past due financing receivables as of each balance sheet date:</p> <p>References: <u>ASC 310-10-50-7</u></p>
	<p>The recorded investment in financing receivables on nonaccrual status.</p> <p>References: <u>ASC 310-10-50-7</u></p>

Line Item(s)	Response
	<p>The recorded investment in financing receivables past due 90 days or more and still accruing.</p> <p>References: <u>ASC 310-10-50-7</u></p>
	<p>Provide an analysis of the age of the recorded investment in financing receivables at the end of the reporting period that are past due, as determined by the entity's policy.</p> <p>References: <u>ASC 310-10-50-7A</u> <u>ASC 310-10-50-7B</u></p>
	<p>Note: The disclosure requirement above does not apply to the following financing receivables: a. Receivables measured at fair value with changes in fair value reported in earnings b. Receivables measured at lower of cost or fair value c. Except for credit card receivables, trade accounts receivable that have both of the following characteristics: 1. They have a contractual maturity of one year or less. 2. They arose from the sale of goods or services. d. Participant loans in defined contribution pension plans. e. Lessor's net investments in leveraged leases.</p> <p>References: <u>ASC 310-10-50-7B</u></p>
	<p>Information on foreclosed residential real estate property as follows:</p> <p>References: <u>ASC 270-10-50-1(s)</u></p>
	<p>Disclose the carrying amount of foreclosed residential real estate properties held at the reporting date as a result of obtaining physical possession in accordance with paragraphs 310-40-40-6 and 310-40-55-10A.</p> <p>References: <u>ASC 310-10-50-11</u></p>
	<p>Disclose the recorded investment of consumer mortgage loans secured by residential real estate properties for which formal foreclosure proceedings are in process according to local requirements of the applicable jurisdiction.</p> <p>References: <u>ASC 310-10-50-35</u></p>
	<p>Allowance for credit losses related to financing receivables (see paragraphs 310-10-50-11A through 50-11C below)</p> <p>References: <u>ASC 270-10-50-1(p)(2)</u></p>

Line Item(s)	Response
	<p>Note: The disclosure requirement below does not apply to the following financing receivables: a. Receivables measured at fair value with changes in fair value reported in earnings b. Receivables measured at lower of cost or fair value c. Except for credit card receivables, trade accounts receivable that have both of the following characteristics: 1. They have a contractual maturity of one year or less. 2. They arose from the sale of goods or services. d. Participant loans in defined contribution pension plans. e. Lessor's net investments in leveraged leases.</p> <p>References: <u>ASC 310-10-50-11A</u></p>
	<p>Disclose all of the following by portfolio segment:</p> <p>References: <u>ASC 310-10-50-11B</u></p>
	<p>A description of the accounting policies and methodology used to estimate the allowance for credit losses, including all of the following: (1) A description of the factors that influenced management's judgment, including both historical losses and existing economic conditions. (2) A discussion of risk characteristics relevant to each portfolio segment. (3) Identification of any changes to accounting policies or methodology from the prior period and the rationale for the change.</p> <p>References: <u>ASC 310-10-50-11B(a)</u></p>
	<p>A description of the policy for charging off uncollectible financing receivables.</p> <p>References: <u>ASC 310-10-50-11B(b)</u></p>
	<p>The activity in the allowance for credit losses for each period, including all of the following: (1) The balance in the allowance at the beginning and end of each period. (2) Current period provision. (3) Direct write-downs charged against the allowance. (4) Recoveries of amounts previously charged off.</p> <p>References: <u>ASC 310-10-50-11B(c)</u></p>
	<p>The quantitative effect on the current period provision related to the disclosed changes in the accounting policies or methodology applied in prior periods.</p> <p>References: <u>ASC 310-10-50-11B(d)</u></p>
	<p>The amount of any significant purchases of financing receivables during each reporting period.</p> <p>References: <u>ASC 310-10-50-11B(e)</u></p>

Line Item(s)	Response
	<p>The amount of any significant sales of financing receivables or reclassifications of financing receivables to held for sale during each reporting period.</p> <p>References: <u>ASC 310-10-50-11B(f)</u></p>
	<p>The balance in the allowance for credit losses at the end of each period disaggregated on the basis of the entity's impairment method.</p> <p>References: <u>ASC 310-10-50-11B(g)</u></p>
	<p>The recorded investment in financing receivables at the end of each period related to each balance in the allowance for credit losses, disaggregated on the basis of the entity's impairment methodology.</p> <p>References: <u>ASC 310-10-50-11B(h)</u></p>
	<p>To disaggregate the information required by the last two items in the preceding paragraph on the basis of the impairment methodology, an entity shall separately disclose the following amounts: (1) Amounts collectively evaluated for impairment (determined under ASC 450-20). (2) Amounts individually evaluated for impairment (determined under ASC 310-10-35). (3) Amounts related to loans acquired with deteriorated credit quality (determined under ASC 310-30).</p> <p>References: <u>ASC 310-10-50-11C</u></p>
	<p>Impaired loans (see paragraphs 310-10-50-14A through 50-15 below)</p> <p>References: <u>ASC 270-10-50-1(p)(3)</u>.</p>
	<p>For each class of financing receivable, disclose both of the following for loans that meet the definition of an impaired loan in ASC 310-10-35-16 through 35-17 (individually evaluated for impairment): (1) The accounting for impaired loans. (2) The amount of impaired loans.</p> <p>References: <u>ASC 310-10-50-14A</u></p>
	<p>Disclose all of the following information about loans that meet the definition of an impaired loan in ASC 310-10-35-16 through 35-17 by class of financing receivable.</p> <p>References: <u>ASC 310-10-50-15</u></p>

Line Item(s)	Response
<p>The recorded investment in the impaired loans and both of the following: (1) The amount of that recorded investment for which there is a related allowance for credit losses determined in accordance with ASC 310-10-35 and the amount of that allowance. (2) The amount of that recorded investment for which there is no related allowance for credit losses determined in accordance with ASC 310-10-35.</p> <p>References: <u>ASC 310-10-50-15(a)(3)</u></p>	
<p>The total unpaid principal balance of the impaired loans.</p> <p>References: <u>ASC 310-10-50-15(a)(4)</u></p>	
<p>The entity's policy for recognizing interest income on impaired loans, including how cash receipts are recorded.</p> <p>References: <u>ASC 310-10-50-15(b)</u></p>	
<p>For each period for which results of operations are presented: (1) The average recorded investment in the impaired loans. (2) The related amount of interest income recognized during the time within that period that the loans were impaired. (3) The amount of interest income recognized using a cash-basis method of accounting during the time within that period that the loans were impaired, if practicable.</p> <p>References: <u>ASC 310-10-50-15(c)</u></p>	
<p>The entity's policy for determining which loans the entity assesses for impairment under ASC 310-10-35.</p> <p>References: <u>ASC 310-10-50-15(d)</u></p>	
<p>The factors considered in determining that the loan is impaired.</p> <p>References: <u>ASC 310-10-50-15(e)</u></p>	
<p>Credit-quality information related to financing receivables (see paragraphs 310-10-50-27 through 50-30)</p> <p>References: <u>ASC 270-10-50-1(p)(4)</u></p>	

Line Item(s)	Response
	<p>Note: The disclosure requirement below does not apply to the following financing receivables: a. Receivables measured at fair value with changes in fair value reported in earnings b. Receivables measured at lower of cost or fair value c. Except for credit card receivables, trade accounts receivable that have both of the following characteristics: 1. They have a contractual maturity of one year or less. 2. They arose from the sale of goods or services. d. Participant loans in defined contribution pension plans.</p> <p>References: <u>ASC 310-10-50-27</u></p>
	<p>Provide information about financing receivables that enables financial statement users to do both of the following:</p> <p>References: <u>ASC 310-10-50-27</u> <u>ASC 310-10-50-28</u></p>
	<p>Understand how and to what extent management monitors the credit quality of financing receivables in an ongoing manner.</p> <p>References: <u>ASC 310-10-50-28(a)</u>.</p>
	<p>Assess the quantitative and qualitative risks arising from the credit quality of financing receivables.</p> <p>References: <u>ASC 310-10-50-28(b)</u>.</p>
	<p>To meet the objective in the preceding requirement above, provide quantitative and qualitative information by class about the credit quality of financing receivables, including all of the following: (1) A description of the credit quality indicator. (2) The recorded investment in financing receivables by credit quality indicator. (3) For each credit quality indicator, the date or range of dates in which the information was updated for that credit quality indicator.</p> <p>References: <u>ASC 310-10-50-29</u></p>
	<p>If an entity discloses internal risk ratings, then provide qualitative information on how those internal risk ratings relate to the likelihood of loss.</p> <p>References: <u>ASC 310-10-50-30</u></p>
	<p>Modifications of financing receivables (see paragraphs 310-10-50-31 through 50-34).</p> <p>References: <u>ASC 270-10-50-1(p)(5)</u>.</p>

Note: Except as noted in the following paragraph, the guidance in ASC 310-10-50-33 through 50-34 applies only to a creditor's troubled debt restructurings of financing receivables. For purposes of this disclosure guidance, a creditor's modification of a lease receivable that meets the definition of a troubled debt restructuring is subject to this disclosure guidance.

References: ASC 310-10-50-31

Note: The disclosure requirement below does not apply to the following financing receivables: a. Receivables measured at fair value with changes in fair value reported in earnings b. Receivables measured at lower of cost or fair value c. Except for credit card receivables, trade accounts receivable that have both of the following characteristics: 1. They have a contractual maturity of one year or less. 2. They arose from the sale of goods or services. d. Participant loans in defined contribution pension plans. e. Loans acquired with deteriorated credit quality (determined under ASC 310-30) that are accounted for within a pool.

References: ASC 310-10-50-32

For each period for which a statement of income is presented, disclose the following about troubled debt restructurings of financing receivables that occurred during the period:

References: ASC 310-10-50-33

By class of financing receivable, qualitative and quantitative information, including both of the following:
(1) How the financing receivables were modified. (2) The financial effects of the modifications.

References: ASC 310-10-50-33(a)

By portfolio segment, qualitative information about how such modifications are factored into the determination of the allowance for credit losses.

References: ASC 310-10-50-33(b)

For each period for which a statement of income is presented, disclose the following for financing receivables modified as troubled debt restructurings within the previous 12 months and for which there was a payment default during the period:

References: ASC 310-10-50-34

Line Item(s)	Response
	<p>By class of financing receivable, qualitative and quantitative information about those defaulted financing receivables, including both of the following: (1) The types of financing receivables that defaulted. (2) The amount of financing receivables that defaulted.</p> <p>References: <u>ASC 310-10-50-34(a)</u>.</p>
	<p>By portfolio segment, qualitative information about how such defaults are factored into the determination of the allowance for credit losses.</p> <p>References: <u>ASC 310-10-50-34(b)</u>.</p>
Gross and Net Information	
	<p>Note: The gross information and net information required by paragraphs 210-20-50-1 through 50-6 should be disclosed as follows:</p> <p>References: <u>ASC 270-10-50-1(g)</u>.</p>
	<p>The following disclosures are required for derivatives accounted for under ASC 815 (including bifurcated embedded derivatives), repurchase and reverse repurchase agreements, and securities lending or securities borrowing transactions that are offset in accordance with ASC 210-20-45 or ASC 815-10-45. These disclosures are also required if these transactions are subject to a master netting or similar agreement, irrespective of whether they are offset.</p> <p>References: <u>ASC 210-20-50-1</u></p>
	<p>Disclose information to enable users of the financial statements to evaluate the effect or potential effect of netting arrangements on the entity's financial position. This includes the effect or potential effect of rights of setoff associated with recognized assets and recognized liabilities.</p> <p>References: <u>ASC 210-20-50-2</u></p>
	<p>Disclose at the end of the reporting period the following quantitative information separately for assets and liabilities in a tabular format, unless another format is more appropriate.</p> <p>References: <u>ASC 210-20-50-3</u></p>
	<p>The gross amounts of those recognized assets and liabilities.</p> <p>References: <u>ASC 210-20-50-3(a)</u></p>

Line Item(s)	Response
<p>The amounts offset in accordance with the guidance in ASC 210-20-45 and ASC 815-10-45 to determine the net amounts presented in the statement of financial position.</p> <p>References: <u>ASC 210-20-50-3(b)</u></p>	
<p>The net amounts presented in the statement of financial position.</p> <p>References: <u>ASC 210-20-50-3(c)</u></p>	
<p>The amounts subject to an enforceable master netting arrangement or similar agreement not otherwise included in the amounts offset disclosed in accordance with ASC 210-20-45 and 815-10-45, including the following:</p> <p>References: <u>ASC 210-20-50-3(d)</u></p>	
<p>The amounts related to recognized financial instruments and other derivative instruments that either:</p>	
<p>Management makes an accounting policy election not to offset.</p> <p>References: <u>ASC 210-20-50-3(d)(1)</u></p>	
<p>Do not meet some or all of the guidance in either ASC 210-20-45 or ASC 815-10-45.</p> <p>References: <u>ASC 210-20-50-3(d)(1)</u></p>	
<p>The amounts related to financial collateral (including cash collateral).</p> <p>References: <u>ASC 210-20-50-3(d)(2)</u></p>	
<p>The net amount after deducting the amounts subject to an enforceable master netting arrangement from the net amounts presented in the statement of financial position. Note - the total amount disclosed subject to an enforceable master netting arrangement for an instrument shall not exceed the amount presented in the statement of financial position for that instrument.</p> <p>References: <u>ASC 210-20-50-4</u></p>	

Line Item(s)	Response
<p>Disclose a description of the rights of setoff associated with recognized assets and recognized liabilities subject to an enforceable master netting arrangement or similar agreement that are no otherwise offset, including the nature of those rights.</p> <p>References: ASC 210-20-50-5</p>	
<p>If the information required in ASC 210-20-50-1 through 50-5 is disclosed in more than a single note to the financial statements, provide a cross-reference between those notes.</p> <p>References: ASC 210-20-50-6</p>	
Other Interim Disclosures	
<p>Note: Disclosure of the impact of the financial results for interim periods of the matters discussed in paragraphs 270-10-45-12 through 45-16 and 270-10-50-5 through 50-6 is desirable for as many subsequent periods as necessary to keep the reader fully informed. There is a presumption that users of summarized interim financial data will have read the latest published annual report, including the financial disclosures required by generally accepted accounting principles (GAAP) and management's commentary concerning the annual financial results, and that the summarized interim data will be viewed in that context. In this connection, management is encouraged to provide commentary relating to the effects of significant events upon the interim financial results.</p> <p>References: ASC 270-10-50-3</p>	
Business Combinations References: ASC 270-10-50-7(a)	
<p>Note: If the combination is a taxable reorganization, the provisions of ASC 805, Business Combinations, should be followed, including its disclosure requirements.</p>	
The acquirer shall disclose information that enables users of its financial statements to evaluate the nature and financial effect of a business combination that occurs either: References: ASC 805-10-50-1	
<p>During the current reporting period.</p> <p>References: ASC 805-10-50-1(a)</p>	

Line Item(s)	Response
	<p>After the reporting date but before the financial statements are issued (or available to be issued).</p> <p>References: <u>ASC 805-10-50-1(b)</u></p>
	<p>The acquirer shall disclose the following information for each business combination that occurs during the reporting period:</p> <p>References: <u>ASC 805-10-50-2</u></p>
	<p>The name and a description of the acquiree.</p> <p>References: <u>ASC 805-10-50-2(a)</u></p>
	<p>The acquisition date.</p> <p>References: <u>ASC 805-10-50-2(b)</u></p>
	<p>The percentage of voting equity interests acquired.</p> <p>References: <u>ASC 805-10-50-2(c)</u></p>
	<p>The primary reasons for the business combination and a description of how the acquirer obtained control of the acquiree.</p> <p>References: <u>ASC 805-10-50-2(d)</u></p>
	<p>For transactions that are recognized separately from the acquisition of assets and assumptions of liabilities in the business combination, disclose:</p> <p>References: <u>ASC 805-10-50-2(e)</u></p>
	<p>A description of each transaction.</p> <p>References: <u>ASC 805-10-50-2(e)(1)</u></p>
	<p>How the acquirer accounted for each transaction.</p> <p>References: <u>ASC 805-10-50-2(e)(2)</u></p>

Line Item(s)	Response
<p>The amounts recognized for each transaction and the line item in the financial statements in which each amount is recognized.</p> <p>References: <u>ASC 805-10-50-2(e)(3)</u>.</p>	
<p>If the transaction is the effective settlement of a preexisting relationship, the method used to determine the settlement amount.</p> <p>References: <u>ASC 805-10-50-2(e)(4)</u>.</p>	
<p>Include the amount of acquisition-related costs, the amount recognized as an expense, and the line item or items in the income statement in which those expenses are recognized. The amount of any issuance costs not recognized as an expense and how they were recognized also shall be disclosed.</p> <p>References: <u>ASC 805-10-50-2(f)</u>.</p>	
<p>In a business combination achieved in stages, disclose all of the following:</p> <p>References: <u>ASC 805-10-50-2(g)</u>.</p>	
<p>The acquisition-date fair value of the equity interest in the acquiree held by the acquirer immediately before the acquisition date.</p> <p>References: <u>ASC 805-10-50-2(g)(1)</u>.</p>	
<p>The amount of any gain or loss recognized as a result of remeasuring to fair value the equity interest in the acquiree held by the acquirer immediately before the business combination (see paragraph 805-10-25-10) and the line item in the income statement in which that gain or loss is recognized.</p> <p>References: <u>ASC 805-10-50-2(g)(2)</u>.</p>	
<p>The valuation technique(s) used to measure the acquisition-date fair value of the equity interest in the acquiree held by the acquirer immediately before the business combination.</p> <p>References: <u>ASC 805-10-50-2(g)(3)</u>.</p>	

Line Item(s)	Response
<p>Information that enables users of the acquirer's financial statements to assess the inputs used to develop the fair value measurement of the equity interest in the acquiree held by the acquirer immediately before the business combination.</p> <p>References: <u>ASC 805-10-50-2(g)(4)</u>.</p>	
<p>If the acquirer is a public business entity, disclose all of the following:</p> <p>References: <u>ASC 805-10-50-2(h)</u>.</p>	
<p>The amounts of revenue and earnings of the acquiree since the acquisition date included in the consolidated income statement for the reporting period.</p> <p>References: <u>ASC 805-10-50-2(h)(1)</u>.</p>	
<p>If comparative financial statements are not presented, the revenue and earnings of the combined entity for the current reporting period as though the acquisition date for all business combinations that occurred during the year had been as of the beginning of the annual reporting period (supplemental pro forma information).</p> <p>References: <u>ASC 805-10-50-2(h)(2)</u>.</p>	
<p>If comparative financial statements are presented, the revenue and earnings of the combined entity as though the business combination(s) that occurred during the current year had occurred as of the beginning of the comparable prior annual reporting period (supplemental pro forma information). For example, for a calendar year-end entity, disclosures would be provided for a business combination that occurs in 20X2, as if it occurred on January 1, 20X1. Such disclosures would not be revised if 20X2 is presented for comparative purposes with the 20X3 financial statements (even if 20X2 is the earliest period presented).</p> <p>References: <u>ASC 805-10-50-2(h)(3)</u>.</p>	
<p>The nature and amount of any material, nonrecurring pro forma adjustments directly attributable to the business combination(s) included in the reported pro forma revenue and earnings (supplemental pro forma information).</p> <p>References: <u>ASC 805-10-50-2(h)(4)</u>.</p>	

Line Item(s)	Response
	<p>If disclosure of any of the information required by ASC 805-10-50-2(h) is impracticable, the acquirer shall disclose that fact and explain why the disclosure is impracticable. In this context, the term impracticable has the same meaning as in paragraph 250-10-45-9.</p> <p>References: <u>ASC 805-10-50-2(h)</u>.</p>
	<p>For intangible assets acquired either individually or as part of a group of assets (in either an asset acquisition or business combination), all of the following information shall be disclosed in the notes to financial statements in the period of acquisition:</p>
	<p>For intangible assets subject to amortization, disclose all of the following:</p>
	<p>The total amount assigned and the amount assigned to any major intangible asset class.</p>
	<p>The amount of any significant residual value, in total and by major intangible asset class.</p>
	<p>The weighted-average amortization period, in total and by major intangible asset class.</p>
	<p>For intangible assets not subject to amortization, the total amount assigned and the amount assigned to any major intangible asset class.</p>
	<p>The amount of research and development assets acquired in a transaction other than a business combination and written off in the period and the line item in the income statement in which the amounts written off are aggregated.</p>
	<p>For intangible assets with renewal or extension terms, the weighted-average period before the next renewal or extension (both explicit and implicit), by major intangible asset class.</p>
	<p>For indemnification assets disclose:</p> <p>References: <u>ASC 805-20-50-1(a)</u>.</p>
	<p>The amount recognized as of the acquisition date.</p> <p>References: <u>ASC 805-20-50-1(a)(1)</u>.</p>
	<p>A description of the arrangement and the basis for determining the amount of the payment.</p> <p>References: <u>ASC 805-20-50-1(a)(2)</u>.</p>

Line Item(s)	Response
	<p>An estimate of the range of outcomes (undiscounted) or, if a range cannot be estimated, that fact and the reasons why a range cannot be estimated. If the maximum amount of the payment is unlimited, the acquirer shall disclose that fact.</p> <p>References: <u>ASC 805-20-50-1(a)(3)</u>.</p>
	<p>For acquired receivables not subject to the requirements of ASC 310-30:</p> <p>References: <u>ASC 805-20-50-1(b)</u>.</p>
	<p>The fair value of the receivables (unless the entity has adopted ASU 2016-02 in the fiscal year, and those receivables which arise from sales-type leases or direct financing leases by the lessor for which the acquirer shall disclose the amounts recognized as of the acquisition date).</p> <p>References: <u>ASC 805-20-50-1(b)(1)</u>.</p>
	<p>The gross contractual amounts receivable.</p> <p>References: <u>ASC 805-20-50-1(b)(2)</u>.</p>
	<p>The best estimate at the acquisition date of the contractual cash flows not expected to be collected.</p> <p>References: <u>ASC 805-20-50-1(b)(3)</u>.</p>
	<p>Note: The disclosures shall be provided by major class of receivable, such as loans, direct finance leases in accordance with ASC 840-30 (or 842-30 as applicable), and any other class of receivables.</p> <p>References: <u>ASC 805-20-50-1</u></p>
	<p>The amounts recognized as of the acquisition date for each major class of assets acquired and liabilities assumed.</p> <p>References: <u>ASC 805-20-50-1(c)</u>.</p>
	<p>For contingencies, the following disclosures shall be included in the footnote that describes the business combination:</p> <p>References: <u>ASC 805-20-50-1(d)</u>.</p>

Line Item(s)	Response
<p>For assets and liabilities arising from contingencies recognized at the acquisition date:</p> <p>References: <u>ASC 805-20-50-1(d)(1)</u>.</p>	
<p>The amounts recognized at the acquisition date and the measurement basis applied (that is, at fair value or at an amount recognized in accordance with ASC 450-20-25).</p> <p>References: <u>ASC 805-20-50-1(d)(1)(i)</u>.</p>	
<p>The nature of the contingencies.</p> <p>References: <u>ASC 805-20-50-1(d)(1)(ii)</u>.</p>	
<p>For contingencies that are not recognized at the acquisition date, the disclosures required by ASC 450 if the criteria for disclosures in that Topic are met.</p> <p>References: <u>ASC 805-20-50-1(d)(2)</u>.</p>	
<p>Note: An acquirer may aggregate disclosures for assets or liabilities arising from contingencies that are similar in nature.</p> <p>References: <u>ASC 805-20-50-1(d)</u>.</p>	
<p>For each business combination in which the acquirer holds less than 100 percent of the equity interests in the acquiree at the acquisition date, disclose:</p> <p>References: <u>ASC 805-20-50-1(e)</u>.</p>	
<p>The fair value of the noncontrolling interest in the acquiree at the acquisition date.</p> <p>References: <u>ASC 805-20-50-1(e)(1)</u>.</p>	
<p>The valuation technique(s) and significant inputs used to measure the fair value of the noncontrolling interest.</p> <p>References: <u>ASC 805-20-50-1(e)(2)</u>.</p>	

Line Item(s)	Response
	<p>A qualitative description of the factors that make up the goodwill recognized, such as expected synergies from combining operations of the acquiree and the acquirer, intangible assets that do not qualify for separate recognition, or other factors.</p> <p>References: <u>ASC 805-30-50-1(a)</u>.</p>
	<p>The acquisition-date fair value of the total consideration transferred and the acquisition-date fair value of each major class of consideration, such as the following: 1) cash, 2) other tangible or intangible assets, including a business or subsidiary of the acquirer, 3) liabilities incurred, for example, a liability for contingent consideration, or 4) equity interests of the acquirer, including the number of instruments or interests issued or issuable and the method of determining the fair value of those instruments or interests.</p> <p>References: <u>ASC 805-30-50-1(b)</u>.</p>
	<p>For contingent consideration arrangements, disclose all of the following:</p> <p>References: <u>ASC 805-30-50-1(c)</u>.</p>
	<p>The amount recognized as of the acquisition date.</p> <p>References: <u>ASC 805-30-50-1(c)(1)</u>.</p>
	<p>A description of the arrangement and the basis for determining the amount of the payment</p> <p>References: <u>ASC 805-30-50-1(c)(2)</u>.</p>
	<p>An estimate of the range of outcomes (undiscounted) or, if a range cannot be estimated, that fact and the reasons why a range cannot be estimated. If the maximum amount of the payment is unlimited, the acquirer shall disclose that fact.</p> <p>References: <u>ASC 805-30-50-1(c)(3)</u>.</p>
	<p>The total amount of goodwill that is expected to be deductible for tax purposes.</p> <p>References: <u>ASC 805-30-50-1(d)</u>.</p>

Line Item(s)**Response**

The amount of goodwill by reportable segment. If the assignment of goodwill to reporting units required by paragraphs 350-20-35-41 through 35-44 has not been completed as of the date the financial statements are issued or are available to be issued, the acquirer shall disclose that fact.

References: ASC 805-30-50-1(e)

In a bargain purchase, disclose:

References: ASC 805-30-50-1(f)

The amount of any gain recognized in accordance with paragraph 805-30-25-2 and the line item in the income statement in which the gain is recognized.

References: ASC 805-30-50-1(f)(1)

A description of the reasons why the transaction resulted in a gain.

References: ASC 805-30-50-1(f)(2)

For individually immaterial business combinations occurring during the reporting period that are material collectively, the acquirer shall disclose the information required by ASC 805-10-50-2 (e) through (h), ASC 805-20-50-1, 805-20-50-4A, ASC 805-30-50-1, and ASC 805-30-50-4(a) in the aggregate.

References: ASC 805-10-50-3

ASC 805-20-50-2

ASC 805-20-50-4

ASC 805-30-50-2

ASC 805-30-50-4

Line Item(s)	Response
	<p>If the acquisition date of a business combination is after the reporting date but before the financial statements are issued or are available to be issued (as discussed in Section 855-10-25), the acquirer shall disclose the information required by paragraph 805-10-50-2 unless the initial accounting for the business combination is incomplete at the time the financial statements are issued or are available to be issued. In that situation, the acquirer shall describe which disclosures could not be made and the reason why they could not be made.</p> <p>References: <u>ASC 805-10-50-4</u> <u>ASC 805-20-50-3</u> <u>ASC 805-30-50-3</u></p>
	<p>For business combinations that occurred in the current or previous reporting periods:</p>
	<p>The acquirer shall disclose information that enables users of its financial statements to evaluate the financial effects of adjustments recognized in the current reporting period that relate to business combinations that occurred in the current or previous reporting periods.</p> <p>References: <u>ASC 805-10-50-5</u></p>
	<p>If the initial accounting for a business combination is incomplete for particular assets, liabilities, noncontrolling interests, or items of consideration and the amounts recognized in the financial statements for the business combination thus have been determined only provisionally, the acquirer shall disclose the following information for each material business combination or in the aggregate for individually immaterial business combinations that are material collectively:</p> <p>References: <u>ASC 805-20-50-4A</u></p>
	<p>The reasons why the initial accounting is incomplete.</p> <p>References: <u>ASC 805-20-50-4A(a)</u></p>
	<p>The assets, liabilities, equity interests, or items of consideration for which the initial accounting is incomplete.</p> <p>References: <u>ASC 805-20-50-4A(b)</u></p>
	<p>The nature and amount of any measurement period adjustments recognized during the reporting period in accordance with ASC 805-10-25-17.</p> <p>References: <u>ASC 805-20-50-4A(c)</u></p>

Line Item(s)	Response
	<p>For each reporting period after the acquisition date until the entity collects, sells, or otherwise loses the right to a contingent consideration asset, or until the entity settles a contingent consideration liability or the liability is cancelled or expires, disclose all of the following:</p> <p>References: <u>ASC 805-30-50-4(a)</u></p>
	<p>Any changes in the recognized amounts, including any differences arising upon settlement.</p> <p>References: <u>ASC 805-30-50-4(a)(1)</u></p>
	<p>Any changes in the range of outcomes (undiscounted) and the reasons for those changes.</p> <p>References: <u>ASC 805-30-50-4(a)(2)</u></p>
	<p>The disclosures required by ASC 820-10-50.</p> <p>References: <u>ASC 805-30-50-4(a)(3)</u></p>
	<p>A reconciliation of the carrying amount of goodwill at the beginning and end of the reporting period as required by ASC 350-20-50-1.</p> <p>References: <u>ASC 805-30-50-4(b)</u></p>
	<p>If the specific disclosures required by ASC 805-10 and other GAAP do not meet the objectives set out in ASC 805-10-50-1 and ASC 805-10-50-5, the acquirer shall disclose whatever additional information is necessary to meet those objectives.</p> <p>References: <u>ASC 805-10-50-7</u></p>
	<p>Consolidated financial statements prepared following a reverse acquisition are issued under the name of the legal parent (accounting acquiree) but described in the notes as a continuation of the financial statements of the legal subsidiary (accounting acquirer), with one adjustment, which is to retroactively adjust the accounting acquirer's legal capital to reflect the legal capital of the accounting acquiree. That adjustment is required to reflect the capital of the legal parent (the accounting acquiree). Comparative information presented in those consolidated financial statements also is retroactively adjusted to reflect the legal capital of the legal parent (accounting acquiree).</p> <p>References: <u>ASC 805-40-45-1</u></p>

Line Item(s)	Response
	<p>Disclose any adjustments of the beginning-of-the-year balance of a valuation allowance because of a change in circumstances that causes a change in judgment about the realizability of the related deferred tax asset in future years (e.g., any acquisition-date income tax benefits or expenses recognized from changes in the acquirer's valuation allowance for its previously existing deferred tax assets as a result of a business combination).</p> <p>References: ASC 805-740-50-1</p>
	<p>For the entity (acquiree) that elects to apply push down accounting in its separate financial statements, disclose information in the period in which the pushdown accounting was applied (or in the current reporting period if the entity recognizes adjustments that relate to pushdown accounting) that enables users of financial statements to evaluate the effect of pushdown accounting. To meet this disclosure objective, the entity shall consider the disclosure requirements in other Subtopics of ASC 805. Information to evaluate the effect of pushdown accounting may include the following:</p> <p>References: ASC 805-50-50-5</p>
	<p>The name and a description of the acquirer and a description of how the acquirer obtained control of the acquiree.</p> <p>References: ASC 805-50-50-6</p>
	<p>The acquisition date.</p> <p>References: ASC 805-50-50-6</p>
	<p>The acquisition-date fair value of the total consideration transferred by the acquirer.</p> <p>References: ASC 805-50-50-6</p>
	<p>The amounts recognized by the acquiree as of the acquisition date for each major class of assets and liabilities as a result of applying pushdown accounting. If the initial accounting for pushdown accounting is incomplete for any amounts recognized by the acquiree, the reasons why the initial accounting is incomplete.</p> <p>References: ASC 805-50-50-6</p>

Line Item(s)	Response
	<p>A qualitative description of the factors that make up the goodwill recognized, such as expected synergies from combining operations of the acquiree and the acquirer, or intangible assets that do not qualify for separate recognition, or other factors. In a bargain purchase (see ASC 805-30-25-2 through 25-4), the amount of the bargain purchase recognized in additional paid-in capital (or net assets of a not for-profit acquiree) and a description of the reasons why the transaction resulted in a gain.</p> <p>References: <u>ASC 805-50-50-6</u></p>
	<p>Information to evaluate the financial effects of adjustments recognized in the current reporting period that relate to pushdown accounting that occurred in the current or previous reporting periods (including those adjustments made as a result of the initial accounting for pushdown accounting being incomplete [see ASC 805-10-25-13 through 25-14]).</p> <p>References: <u>ASC 805-50-50-6</u></p>
	<p>Note: The information in this paragraph is not an exhaustive list of disclosure requirements. The acquiree shall disclose whatever additional information is necessary to meet the disclosure objective set out in ASC 805-50-50-5.</p> <p>References: <u>ASC 805-50-50-6</u></p>
<p>Business combinations - Investment companies</p> <p>References: <u>ARM 9652.2</u></p> <p><u>TIS Section 6910.33</u></p>	
	<p>Note: When a merger takes place between two or more investment companies, careful consideration must be given to what, if any, historical performance information should be presented. In a no-action response to North American Security Trust, the SEC staff stated that the accounting survivor in a merger of funds is not necessarily the surviving legal entity.</p> <p>References: <u>ARM 9652.2</u></p> <p><u>TIS Section 6910.33</u></p>

Line Item(s)	Response
	<p>Companies combined in a nontaxable exchange of shares should carry forward the historical cost basis of investment securities to the surviving entity and should not restate the results of operations for pre-combination periods. Adjustments to the combined components of capital should also be considered for originating temporary differences received in the combination. The amount of unrealized appreciation or depreciation and the amount of undistributed investment company income, if significant, should be disclosed separately to report meaningful information about the fund's performance.</p> <p>References: <u>TIS Section 6910.33</u></p>
	<p>The costs of purchases and proceeds from sales of portfolio securities occurring in an effort to realign the surviving fund's portfolio after the combination may be excluded from the computation of portfolio turnover.</p> <p>References: <u>TIS Section 6910.33</u></p>
Business combinations - pro forma disclosures	
	<p>Where a material business combination has occurred during the current fiscal year, pro forma disclosure shall be made of the results of operations for the current year up to the date of the most recent interim balance sheet provided (and the corresponding period of the preceding year) as though the companies had combined at the beginning of the period being reported on. At a minimum, include:</p> <p>References: <u>S-X 10-01(b)(4)</u></p>
	<p>Revenue</p> <p>References: <u>S-X 10-01(b)(4)</u></p>
	<p>Income before extraordinary items and the cumulative effect of accounting changes</p> <p>References: <u>S-X 10-01(b)(4)</u></p>
	<p>Income or loss per share</p> <p>References: <u>S-X 10-01(b)(4)</u></p>
	<p>Net income or loss</p> <p>References: <u>S-X 10-01(b)(4)</u></p>

Line Item(s)	Response
<p>Net income or loss attributable to the registrant</p> <p>References: <u>S-X 10-01(b)(4)</u></p>	
<p>Net income or loss per share</p> <p>References: <u>S-X 10-01(b)(4)</u></p>	
<p>Summarized income statement information of 50% or less owned entities</p>	
<p>Note: Summarized information may be omitted for 50 percent or less owned persons if such entities would be exempt from filing quarterly information pursuant to Exchange Rules 13a-13 or 15d-13, if they were registrants.</p> <p>References: <u>S-X 10-01(b)(1)</u></p>	
<p>For each subsidiary not consolidated, or 50% or less owned persons, or each group of such subsidiaries or 50% or less owned persons for which separate individual or group statements would otherwise be required for annual periods (e.g. under rule 3-09 or 4-08(g)), include the following:</p> <p>References: <u>S-X 10-01(b)(1)</u></p> <p><u>SAB Topic 6K 4.a</u></p> <p><u>SAB Topic 6K 4.b</u></p>	
<p>Net sales or gross revenues</p> <p>References: <u>S-X 1-02(bb)</u></p>	
<p>Gross profit or costs and expenses applicable to net sales or gross revenues</p> <p>References: <u>S-X 1-02(bb)</u></p>	
<p>Income or loss from continuing operations before cumulative effect of a change in accounting principle</p> <p>References: <u>S-X 1-02(bb)</u></p>	
<p>Net income or loss attributable to the entity</p> <p>References: <u>S-X 1-02(bb)</u></p>	

Line Item(s)	Response
<p>Disclose the aggregate dollar and per-share effect of situations where temporary tax exemptions or "tax holidays" exist.</p> <p>References: SAB Topic 6.I.2 SAB Topic 11.C</p>	
<p>Specialized industries may substitute other information for sales and related costs and expenses, if necessary, for a more meaningful presentation.</p> <p>References: S-X 1-02(bb)</p>	
Guarantor Condensed Consolidated Financial Statements	
<p>Note: Paragraph (a) of S-X 3-10 contains the general rule that every issuer of a registered security that is guaranteed and every guarantor of a registered security must file the financial statements required for a registrant by Regulation S-X. Paragraphs (b) through (f) of S-X 3-10 provide exceptions to the general rule.</p> <p>References: S-X 3-10</p>	
<p>For interim periods, condensed consolidating financial information for guarantors presented in accordance with S-X 3-10, which may be unaudited in a Form 10-Q, is required for the same periods that the registrant's financial statements are presented.</p> <p>References: S-X 3-10 SEC Volume 3140.3</p>	
Common Control Transactions	
<p>The financial statements of the receiving entity shall report results of operations for the period in which the transfer occurs as though the transfer of net assets or exchange of equity interests had occurred at the beginning of the period. Results of operations for that period will thus comprise those of the previously separate entities combined from the beginning of the period to the date the transfer is completed and those of the combined operations from that date to the end of the period.</p> <p>References: ASC 805-50-45-2</p>	
Disclose the following:	

Line Item(s)	Response
	<p>The nature of and effects on earnings per share (EPS) of nonrecurring intra-entity transactions involving long-term assets and liabilities.</p> <p>References: <u>ASC 805-50-50-2</u></p>
	<p>For the receiving entity, in the period in which the transfer of assets and liabilities or exchange of equity interests occurred:</p> <p>References: <u>ASC 805-50-50-3</u></p>
	<p>The name and brief description of the entity included in the reporting entity as a result of the net asset transfer or exchange of equity interests.</p> <p>References: <u>ASC 805-50-50-3(a)</u></p>
	<p>The method of accounting for the transfer of net assets or exchange of equity interests.</p> <p>References: <u>ASC 805-50-50-3(b)</u></p>
	<p>Note: Consider whether additional disclosures are required in accordance with Section 850-10-50.</p> <p>References: <u>ASC 805-50-50-4</u></p>
	<p>Supplemental disclosure of the separate results of the combined entities for periods prior to the combination shall be given, with appropriate explanations.</p> <p>References: <u>S-X 10-01(b)(3)</u></p>
	<p>Compensation Related Costs - Medicare Prescription Drug, Improvement and Modernization Act of 2003</p> <p>References: <u>ASC 270-10-50-7(b)</u></p>
	<p>In interim and annual financial statements for the first period in which an employer includes the effects of the subsidy in measuring the accumulated postretirement benefit obligation and the first period in which an employer includes the effects of the subsidy in measuring net periodic postretirement benefit cost, it shall disclose all of the following:</p> <p>References: <u>ASC 715-60-50-3</u></p>

Line Item(s)	Response
	<p>The reduction in the accumulated postretirement benefit obligation for the subsidy related to benefits attributed to past service.</p> <p>References: <u>ASC 715-60-50-3(a)</u></p>
	<p>The effect of the subsidy on the measurement of net periodic postretirement benefit cost for the current period. That effect includes any amortization of the actuarial gain in (a) of this paragraph as a component of the net amortization called for by paragraphs 715-60-35-29 through 35-30, the reduction in current period service cost due to the subsidy, and the resulting reduction in interest cost on the accumulated postretirement benefit obligation as a result of the subsidy.</p> <p>References: <u>ASC 715-60-50-3(b)</u></p>
	<p>Any other disclosures required by paragraph 715-20-50-1(r). That is, an explanation of any significant change in the benefit obligation or plan assets not otherwise apparent in the other disclosures required by ASC 715-20, Defined benefit plans - general.</p> <p>References: <u>ASC 715-60-50-3(c)</u></p>
	<p>Until an employer is able to determine whether benefits provided by its plan are actuarially equivalent, it shall disclose the following in financial statements for interim or annual periods:</p> <p>References: <u>ASC 715-60-50-6</u></p>
	<p>The existence of the Medicare Prescription Drug, Improvement, and Modernization Act</p> <p>References: <u>ASC 715-60-50-6(a)</u></p>
	<p>That measures of the accumulated postretirement benefit obligation or net periodic postretirement benefit cost do not reflect any amount associated with the subsidy because the employer is unable to conclude whether the benefits provided by the plan are actuarially equivalent to Medicare Part D under the Act.</p> <p>References: <u>ASC 715-60-50-6(b)</u></p>
<p>Oil and Gas Producing Entities</p> <p>References: <u>ASC 270-10-50-7(c)</u></p> <p><u>ASC 270-10-50-7(i)</u></p>	

Line Item(s)	Response
	<p>Interim financial reports for oil and gas industry reportings shall include information about a major discovery or other favorable or adverse event that causes a significant change from the information presented in the most recent annual financial report concerning oil and gas reserve quantities.</p> <p>References: <u>ASC 932-270-50-1</u></p>
	<p>Interim financial statements shall include information about significant changes from the information presented in the most recent annual financial statements related to the following:</p> <p>References: <u>ASC 932-235-50-1B</u></p>
	<p>The amount of capitalized exploratory well costs that is pending the determination of proved reserves. An entity also shall separately disclose for each annual period that an income statement is presented changes in those capitalized exploratory well costs resulting from all of the following:</p> <p>References: <u>ASC 932-235-50-1B(a)</u></p>
	<p>Additions to capitalized exploratory well costs that are pending the determination of proved reserves</p> <p>References: <u>ASC 932-235-50-1B(a)(1)</u></p>
	<p>Capitalized exploratory well costs that were reclassified to wells, equipment, and facilities based on the determination of proved reserves</p> <p>References: <u>ASC 932-235-50-1B(a)(2)</u></p>
	<p>Capitalized exploratory well costs that were charged to expense.</p> <p>References: <u>ASC 932-235-50-1B(a)(3)</u></p>
	<p>Note: This disclosure shall not include amounts that were capitalized and subsequently expensed in the same annual period.</p> <p>References: <u>ASC 932-235-50-1B</u></p>

Line Item(s)	Response
	<p>The amount of exploratory well costs that have been capitalized for a period of greater than one year after the completion of drilling at the most recent balance sheet date and the number of projects for which those costs relate. Additionally, for exploratory well costs that have been capitalized for periods greater than one year at the most recent balance sheet date, an entity shall provide an aging of those amounts by year, or by using a range of years, and the number of projects to which those costs relate.</p> <p>References: <u>ASC 932-235-50-1B(b)</u>.</p>
	<p>For exploratory well costs that continue to be capitalized for more than one year after the completion of drilling at the most recent balance sheet date, a description of the projects and the activities that the entity has undertaken to date in order to evaluate the reserves and the projects, and the remaining activities required to classify the associated reserves as proved.</p> <p>References: <u>ASC 932-235-50-1B(c)</u>.</p>
	<p>Any impairment of capitalized exploratory well costs that were capitalized for a period of greater than one year after the completion of drilling at the most recent annual balance sheet date shall be considered significant for purposes of determining whether the change shall be disclosed in interim financial statements.</p> <p>References: <u>ASC 932-235-50-1B</u></p>
<p>Guarantor and Product Warranties</p> <p>References: <u>ASC 270-10-50-7(f)</u>.</p>	
	<p>Disclose the following for all guarantees (aside from a guarantee or indemnification that is excluded from the scope of Topic 450 "Contingencies"):</p> <p>References: <u>ASC 460-10-50-1</u></p>
	<p>Disclose certain loss contingencies even though the possibility of loss may be remote. The common characteristic of those contingencies is a guarantee that provides a right to proceed against an outside party in the event that the guarantor is called on to satisfy the guarantee. Examples include, but are not limited to, the following:</p> <p>References: <u>ASC 460-10-50-2</u></p>
	<p>Guarantees of indebtedness of others, including indirect guarantees of indebtedness of others</p> <p>References: <u>ASC 460-10-50-2</u></p>

Line Item(s)	Response
<p>Obligations of commercial banks under standby letters of credit</p> <p>References: <u>ASC 460-10-50-2</u></p>	
<p>Guarantees to repurchase receivables (or, in some cases, to repurchase the related property) that have been sold or otherwise assigned</p> <p>References: <u>ASC 460-10-50-2</u></p>	
<p>Other agreements that in substance have the same guarantee characteristic.</p> <p>References: <u>ASC 460-10-50-2</u></p>	
<p>Disclose the nature and amount of the guarantee. Consideration should be given to disclosing, if estimable, the value of any recovery that could be expected to result, such as from the guarantor's right to proceed against an outside party.</p> <p>References: <u>ASC 460-10-50-3</u></p>	
<p>A guarantor shall disclose all of the following information about each guarantee, or each group of similar guarantees, even if the likelihood of the guarantor's having to make any payments under the guarantee is remote:</p> <p>References: <u>ASC 460-10-50-4</u></p>	
<p>The nature of the guarantee, including the (1) approximate term of the guarantee, (2) how the guarantee arose, (3) the events or circumstances that would require the guarantor to perform under the guarantee, (4) the current status (as of the date of the balance sheet) of the payment / performance risk of the guarantee, and (5) if the entity uses internal groupings for purposes of item (4), how those groupings are determined and used for managing risk.</p> <p>References: <u>ASC 460-10-50-4(a)</u></p>	
<p>Disclose all of the following information about the maximum potential amount of future payments under the guarantee:</p> <p>References: <u>ASC 460-10-50-4(b)</u></p>	

Line Item(s)	Response
	<p>The maximum potential amount of future payments (undiscounted) that the guarantor could be required to make under the guarantee, which shall not be reduced by the effect of any amounts that may possibly be recovered under recourse or collateralization provisions in the guarantee (which are addressed below)</p> <p>References: <u>ASC 460-10-50-4(b)(1)</u>.</p>
	<p>If the terms of the guarantee provide for no limitation to the maximum potential future payments under the guarantee, that fact</p> <p>References: <u>ASC 460-10-50-4(b)(2)</u>.</p>
	<p>If the guarantor is unable to develop an estimate of the maximum potential amount of future payments under its guarantee, the reasons why it cannot estimate the maximum potential amount</p> <p>References: <u>ASC 460-10-50-4(b)(3)</u>.</p>
	<p>The current carrying amount of the liability, if any, for the guarantor's obligations under the guarantee (including the amount, if any, recognized under ASC 450-20-30 "Loss Contingencies - Initial Measurement - General"), regardless of whether the guarantee is freestanding or embedded in another contract</p> <p>References: <u>ASC 460-10-50-4(c)</u>.</p>
	<p>The nature of any recourse provisions that would enable the guarantor to recover from third parties any of the amounts paid under the guarantee</p> <p>References: <u>ASC 460-10-50-4(d)</u>.</p>
	<p>The nature of any assets held either as collateral or by third parties that, upon the occurrence of any triggering event or condition under the guarantee, the guarantor can obtain and liquidate to recover all or a portion of the amounts paid under the guarantee</p> <p>References: <u>ASC 460-10-50-4(e)</u>.</p>
	<p>If estimable, the approximate extent to which the proceeds from liquidation of assets held either as collateral or by third parties would be expected to cover the maximum potential amount of future payments under the guarantee</p> <p>References: <u>ASC 460-10-50-4(f)</u>.</p>

Line Item(s)	Response
<p>The disclosures required by this Subsection do not eliminate or affect the following disclosure requirements:</p> <p>References: <u>ASC 460-10-50-5</u></p>	
<p>The requirements in the General Subsection of Section 825-10-50 that certain entities disclose the fair value of their financial guarantees issued</p> <p>References: <u>ASC 460-10-50-5(a)</u></p>	
<p>The requirements in paragraphs 450-20-50-3 through 50-4 that an entity disclose a contingent loss that has a reasonable possibility of occurring</p> <p>References: <u>ASC 460-10-50-5(b)</u></p>	
<p>The requirements in the Disclosure Sections of Topic 815, which apply to guarantees that are accounted for as derivatives</p> <p>References: <u>ASC 460-10-50-5(c)</u></p>	
<p>The requirements in Section 275-10-50 that an entity disclose information about risks and uncertainties that could significantly affect the amounts reported in the financial statements in the near term. See Example 1 (paragraph 460-10-55-25) for an illustration of the required disclosure.</p> <p>References: <u>ASC 460-10-50-5(d)</u></p>	
<p>Note: Paragraph 460-10-25-6 states that an inability to make a reasonable estimate of the amount of a warranty obligation at the time of sale because of significant uncertainty about possible claims precludes accrual. That paragraph also addresses related implications. Paragraphs 450-20-50-3 through 50-6 provide disclosure guidance for circumstances in which no accrual is made for a loss contingency. In those circumstances, the disclosures required by that paragraph shall be made.</p> <p>References: <u>ASC 460-10-50-7</u></p>	
<p>A guarantor shall disclose all of the following information for product warranties and other guarantee contracts described in ASC 460-10-15-9:</p> <p>References: <u>ASC 460-10-50-8</u></p>	

Line Item(s)	Response
	<p>Note: ASC 460-10-15-9 includes all of the following: (1) product warranties issued by the guarantor, regardless of whether the guarantor is required to make payment in services or cash, (2) separately priced extended warranty or product maintenance contracts, (3) warranty obligations that are incurred in connection with the sale of the product, that is, obligations that are not separately priced or sold but are included in the sale of the product.</p> <p>References: <u>ASC 460-10-50-8</u></p>
	<p>The information required to be disclosed by paragraph 460-10-50-4 except that a guarantor is not required to disclose the maximum potential amount of future payments specified in paragraph 460-10-50-4(b)</p> <p>References: <u>ASC 460-10-50-8</u></p>
	<p>The guarantor's accounting policy and methodology used in determining its liability for product warranties</p> <p>References: <u>ASC 460-10-50-8</u></p>
	<p>A tabular reconciliation of the changes in the guarantor's aggregate product warranty liability for the reporting period. That reconciliation shall include all of the following amounts:</p> <p>References: <u>ASC 460-10-50-8</u></p>
	<p>The beginning balance of the aggregate product warranty liability</p> <p>References: <u>ASC 460-10-50-8</u></p>
	<p>The aggregate reductions in that liability for payments made (in cash or in kind) under the warranty</p> <p>References: <u>ASC 460-10-50-8</u></p>
	<p>The aggregate changes in the liability for accruals related to product warranties issued during the reporting period</p> <p>References: <u>ASC 460-10-50-8</u></p>
	<p>The aggregate changes in the liability for accruals related to preexisting warranties (including adjustments related to changes in estimates)</p> <p>References: <u>ASC 460-10-50-8</u></p>

Line Item(s)	Response
	<p>The ending balance of the aggregate product warranty liability.</p> <p>References: <u>ASC 460-10-50-8</u></p>
<p>Pension and Post Retirement Benefits</p> <p>References: <u>ASC 270-10-50-7(g)</u></p>	
<p>The amount of net benefit cost recognized, for each period for which a statement of income is presented, showing separately each of the following: 1. The service cost component 2. The interest cost component 3. The expected return on plan assets for the period 4. The gain or loss component 5. The prior service cost or credit component 6. The transition asset or obligation component 7. The gain or loss recognized due to a settlement or curtailment.</p> <p>References: <u>ASC 715-20-50-6</u></p>	
<p>The line item(s) used in the income statement to present the components other than the service cost component shall be disclosed if the other components are not presented in a separate line item or items in the income statement.</p> <p>References: <u>ASC 715-20-50-6(a)</u></p>	
<p>The total amount of the employer's contributions paid, and expected to be paid, during the current fiscal year, if significantly different from amounts previously disclosed pursuant to paragraph 715-20-50-1(g). Estimated contributions may be presented in the aggregate combining all of the following: (1) Contributions required by funding regulations or laws; (2) Discretionary contributions; (3) Noncash contributions.</p> <p>References: <u>ASC 715-20-50-6(b)</u></p>	
<p>Discontinued Operations</p> <p>References: <u>ASC 270-10-50-7(k)</u></p>	
<p>Where the registrant has reported a discontinued operation during any of the periods covered by interim financial statements, disclose the following for all periods presented:</p> <p>References: <u>S-X 10-01(b)(5)</u></p>	

Line Item(s)	Response
<p>The effect of the discontinued operation on revenue</p> <p>References: <u>S-X 10-01(b)(5)</u>.</p>	
<p>The effect of the discontinued operation on net income</p> <p>References: <u>S-X 10-01(b)(5)</u>.</p>	
<p>The effect of the discontinued operation on net income per share</p> <p>References: <u>S-X 10-01(b)(5)</u>.</p>	
<p>Disclose the following in the period in which a discontinued operation either has been disposed of or is classified as held for sale:</p> <p>References: <u>ASC 205-20-50-1</u></p>	
<p>A description of the facts and circumstances leading to the disposal or expected disposal and the expected manner and timing of that disposal.</p> <p>References: <u>ASC 205-20-50-1</u></p>	
<p>If not separately presented on the face of the statement where net income is reported as part of discontinued operations (see ASC 205-20-45-3B), the gain or loss recognized in accordance with ASC 205-20-45-3C.</p> <p>References: <u>ASC 205-20-50-1</u></p>	
<p>If applicable, the segment(s) in which the discontinued operation is reported.</p> <p>References: <u>ASC 205-20-50-1</u></p>	
<p>Disclose in the notes to financial statements a description of the facts and circumstances leading to the decision to change the plan for selling the discontinued operation and the change's effect on the results of operations for the period and any prior periods presented</p> <p>References: <u>ASC 205-20-50-3</u></p>	

Line Item(s)	Response
	<p>Disclose the nature and amount of adjustments to amounts previously reported in discontinued operations that are directly related to the disposal of a discontinued operation in a prior period.</p> <p>References: <u>ASC 205-20-50-3A</u></p>
	<p>An entity shall disclose information about its significant continuing involvement with a discontinued operation after the disposal date. Examples of continuing involvement with a discontinued operation after the disposal date include a supply and distribution agreement, a financial guarantee, an option to repurchase a discontinued operation, and an equity method investment in the discontinued operation. The disclosures are required until the results of operations of the discontinued operation in which an entity retains significant continuing involvement are no longer presented separately as discontinued operations in the statement where net income is reported.</p> <p>References: <u>ASC 205-20-50-4A</u></p>
	<p>An entity shall disclose the following in the notes to financial statements for each discontinued operation in which the entity retains significant continuing involvement after the disposal date:</p> <p>References: <u>ASC 205-20-50-4B</u></p>
	<p>A description of the nature of the activities that give rise to the continuing involvement.</p> <p>References: <u>ASC 205-20-50-4B(a)</u></p>
	<p>The period of time during which the involvement is expected to continue.</p> <p>References: <u>ASC 205-20-50-4B(b)</u></p>
	<p>Disclose both of the following for all periods presented: (1) The amount of any cash inflows or outflows from or to the discontinued operation after the disposal transaction. (2) Revenues or expenses presented, if any, in continuing operations after the disposal transaction that before the disposal transaction were eliminated in consolidated financial statements as intra-entity transactions.</p> <p>References: <u>ASC 205-20-50-4B(c)</u></p>

Line Item(s)	Response
	<p>For a discontinued operation in which an entity retains an equity method investment after the disposal (the investee), information that enables users of financial statements to compare the financial performance of the entity from period to period assuming that the entity held the same equity method investment in all periods presented in the statement where net income is reported. The disclosure shall include all of the following until the discontinued operation is no longer reported separately in discontinued operations:</p> <p>References: <u>ASC 205-20-50-4B(d)</u>.</p>
	<p>For each period presented in the statement where net income is reported after the period in which the discontinued operation was disposed of, the pretax income of the investee in which the entity retains an equity method investment.</p> <p>References: <u>ASC 205-20-50-4B(d)</u>.</p>
	<p>The entity's ownership interest in the discontinued operation before the disposal transaction.</p> <p>References: <u>ASC 205-20-50-4B(d)</u>.</p>
	<p>The entity's ownership interest in the investee after the disposal transaction.</p> <p>References: <u>ASC 205-20-50-4B(d)</u>.</p>
	<p>The entity's share of the income or loss of the investee in the period(s) after the disposal transaction and the line item in the statement where net income is reported that includes the income or loss.</p> <p>References: <u>ASC 205-20-50-4B(d)</u>.</p>
	<p>For discontinued operations that meet the criteria in ASC 205-20-45-1B through 45-1C except for a discontinued operation that was an equity method investment before the disposal, an entity shall present on the face of the financial statements as part of discontinued operations or disclose in the notes to financial statements:</p> <p>References: <u>ASC 205-20-50-5A</u> <u>ASC 205-20-50-5B</u></p>
	<p>The pretax profit or loss of the discontinued operation for the periods in which the results of operations of the discontinued operation are presented in the statement where net income is reported.</p> <p>References: <u>ASC 205-20-50-5B(a)</u>.</p>

Line Item(s)**Response**

The major classes of line items constituting the pretax profit or loss of the discontinued operation for the periods in which the results of operations of the discontinued operation are presented in the statement where net income is reported.

References: ASC 205-20-50-5B(b).

Either of the following: (1) The total operating and investing cash flows of the discontinued operation for the periods in which the results of operations of the discontinued operation are presented in the statement where net income is reported. (2) The depreciation, amortization, capital expenditures, and significant operating and investing noncash items of the discontinued operation for the periods in which the results of operations of the discontinued operation are presented in the statement where net income is reported.

References: ASC 205-20-50-5B(c).

If the discontinued operation includes a noncontrolling interest, the pretax profit or loss attributable to the parent for the periods in which the results of operations of the discontinued operation are presented in the statement where net income is reported.

References: ASC 205-20-50-5B(d).

The carrying amount(s) of the major classes of assets and liabilities included as part of a discontinued operation classified as held for sale for the period in which the discontinued operation is classified as held for sale and all prior periods presented in the statement of financial position.

References: ASC 205-20-50-5B(e).

If an entity provides the disclosures required by paragraph 205-20-50-5B(a) (the pre-tax profit and loss), 205-20-50-5B(b) (major classes of line items constituting the pretax profit or loss), and 205-20-50-5B(e) the carrying amount(s) of the major class of assets and liabilities) in the notes to financial statements, the entity shall disclose the following:

References: ASC 205-20-50-5C.

For the initial period in which the disposal group is classified as held for sale and for all prior periods presented in the statement of financial position, a reconciliation of the following:

References: ASC 205-20-50-5C(a).

The carrying amount(s) of the major classes of assets and liabilities included as part of a discontinued operation classified as held for sale for the period in which the discontinued operation is classified as held for sale and all prior periods presented in the statement of financial position.

References: ASC 205-20-50-5C(a)(1)

Total assets and total liabilities of the disposal group classified as held for sale that are presented separately on the face of the statement of financial position. If the disposal group includes assets and liabilities that are not part of the discontinued operation, an entity shall present those assets and liabilities in line items in the reconciliations that are separate from the assets and liabilities of the discontinued operation (see paragraph 205-20-55-102 for an Example).

References: ASC 205-20-50-5C(a)(2)

For the periods in which the results of operations of the discontinued operation are reported in the statement where net income is reported, a reconciliation of both of the following:

References: ASC 205-20-50-5C(b)

The amounts disclosed in the pretax profit or loss (or change in net assets for a not-for-profit entity) of the discontinued operation for the periods in which the results of operations of the discontinued operation are presented in the statement where net income is reported (or statement of activities for a not-for-profit entity) and the major classes of line items constituting the pretax profit or loss (or change in net assets for a not-for-profit entity) of the discontinued operation (for example, revenue, cost of sales, depreciation and amortization, and interest expense) for the periods in which the results of operations of the discontinued operation are presented in the statement where net income is reported (or statement of activities for a not-for-profit entity).

References: ASC 205-20-50-5C(b)(1)

The after-tax profit or loss from discontinued operations presented on the face of the statement where net income is reported.

References: ASC 205-20-50-5C(b)(2)

Note: For purposes of this reconciliation, an entity may aggregate the amounts that are not considered major and present them as one line item in the reconciliation.

References: ASC 205-20-50-5D

Line Item(s)	Response
	<p>Disclose summarized information about the assets, liabilities and results of operations of the investee for an equity method investment that meets the criteria in paragraphs 205-20-45-1B through 45-1C, if that information was disclosed in financial reporting periods before the disposal in accordance with paragraph 323-10-50-3(c).</p> <p>References: <u>ASC 205-20-50-7</u></p>
<p>Disposals of Individually Significant Components</p> <p>References: <u>ASC 270-10-50-7(l)</u></p>	
<p>If a long-lived asset (disposal group) includes an individually significant component of an entity that either has been disposed of or is classified as held for sale and does not qualify for presentation and disclosure as a discontinued operation, the following should be disclosed:</p> <p>References: <u>ASC 360-10-50-3A</u></p>	
<p>A description of the facts and circumstances leading to the disposal or the expected disposal.</p> <p>References: <u>ASC 360-10-50-3</u></p>	
<p>The expected manner and timing of that disposal.</p> <p>References: <u>ASC 360-10-50-3</u></p>	
<p>The gain or loss recognized in accordance with paragraphs 360-10-35-37 through 35-45 and 360-10-40-5.</p> <p>References: <u>ASC 360-10-50-3</u></p>	
<p>If not separately presented on the face of the statement where net income is reported (or in the statement of activities for a not-for-profit entity), the caption in the statement where net income is reported (or in the statement of activities for a not-for-profit entity) that includes that gain or loss.</p> <p>References: <u>ASC 360-10-50-3</u></p>	

Line Item(s)	Response
<p>If not separately presented on the face of the statement of financial position, the carrying amount(s) of the major classes of assets and liabilities included as part of a disposal group classified as held for sale. Any loss recognized on the disposal group classified as held for sale in accordance with paragraphs 360-10-35-37 through 35-45 and 360-10-40-5 shall not be allocated to the major classes of assets and liabilities of the disposal group.</p> <p>References: <u>ASC 360-10-50-3</u></p>	
<p>If applicable, the segment in which the long-lived asset (disposal group) is reported under Topic 280 on segment reporting.</p> <p>References: <u>ASC 360-10-50-3</u></p>	
<p>For a public business entity that has issued, or is a conduit bond obligor for, securities that are traded, listed, or quoted on an exchange or an over-the-counter market, both of the following:</p> <p>References: <u>ASC 360-10-50-3A(a)</u></p>	
<p>The pretax profit or loss of the individually significant component of an entity for the period in which it is disposed of or is classified as held for sale and for all prior periods that are presented in the statement where net income is reported.</p> <p>References: <u>ASC 360-10-50-3A(a)(1)</u></p>	
<p>If the individually significant component of an entity includes a noncontrolling interest, the pretax profit or loss attributable to the parent for the period in which it is disposed of or is classified as held for sale and for all prior periods that are presented in the statement where net income is reported.</p> <p>References: <u>ASC 360-10-50-3A(a)(2)</u></p>	
<p>For all other entities, both of the following:</p> <p>References: <u>ASC 360-10-50-3A(b)</u></p>	
<p>The pretax profit or loss of the individually significant component of an entity for the period in which it is disposed of or is classified as held for sale.</p> <p>References: <u>ASC 360-10-50-3A(b)(1)</u></p>	

Line Item(s)	Response
	<p>If the individually significant component of an entity includes a noncontrolling interest, the pretax profit or loss attributable to the parent for the period in which it is disposed of or is classified as held for sale.</p> <p>References: <u>ASC 360-10-50-3A(b)(2)</u></p>
<p>Insurance Entities and Short-duration Contracts</p> <p>References: <u>ASC 270-10-50-7(m)</u></p>	
<p>For interim reporting periods, all of the following information about the liability for unpaid claims and claim adjustment expenses shall be presented in a tabular rollforward:</p> <p>References: <u>ASC 944-40-50-3</u></p>	
<p>The balance in the liability for unpaid claims and claim adjustment expenses at the beginning of each fiscal year presented in the statement of income, and the related amount of reinsurance recoverable on unpaid claims</p> <p>References: <u>ASC 944-40-50-3(a)</u></p>	
<p>Year-to-date incurred claims and claim adjustment expenses with separate disclosure of the provision for insured events of the current fiscal year and of increases or decreases in the provision for insured events of prior fiscal years</p> <p>References: <u>ASC 944-40-50-3(b)</u></p>	
<p>Year-to-date payments of claims and claim adjustment expenses with separate disclosure of payments of claims and claim adjustment expenses attributable to insured events of the current fiscal year and to insured events of prior fiscal years</p> <p>References: <u>ASC 944-40-50-3(c)</u></p>	
<p>The ending balance in the liability for unpaid claims and claim adjustment expenses and the related amount of reinsurance recoverable.</p> <p>References: <u>ASC 944-40-50-3(cc)</u></p>	

Line Item(s)	Response
	<p>In addition, an insurance entity shall disclose the reasons for the change in incurred claims and claim adjustment expenses recognized in the income statement attributable to insured events of prior fiscal years and indicate whether additional premiums or return premiums have been accrued as a result of the prior-year effects.</p> <p>References: ASC 944-40-50-3</p>
	<p>For interim reporting periods, for health insurance claims, an insurance entity shall disclose the total of incurred-but-not-reported liabilities plus expected development on reported claims included in the liability for unpaid claims and claim adjustment expenses.</p> <p>References: ASC 944-40-50-4E</p>
Subsequent Events	
	<p>The standard requires the following disclosures:</p> <p>References: ASC 855-10-50-1</p>
	<p>Some nonrecognized subsequent events may be of such a nature that they must be disclosed to keep the financial statements from being misleading. For such events, an entity should disclose the following:</p> <p>References: ASC 855-10-50-2</p>
	<p>The nature of the event.</p> <p>References: ASC 855-10-50-2</p>
	<p>An estimate of its financial effect, or a statement that such an estimate cannot be made.</p> <p>References: ASC 855-10-50-2</p>
	<p>An entity also should consider supplementing the historical financial statements with pro forma financial data. Occasionally, a subsequent event may be so significant that disclosure can best be made by means of pro forma financial data. Such data shall give effect to the event as if it had occurred on the balance sheet date. In some situations, an entity also should consider presenting pro forma statements, usually a balance sheet only, in columnar form on the face of the historical statements.</p> <p>References: ASC 855-10-50-2</p>

Line Item(s)	Response
<p>Earnings Per Share</p> <p>References: <u>FSP 29.3.2</u></p> <p><u>FSP 29.4.1</u></p>	
<p>For each period for which an income statement is presented, an entity shall disclose all of the following:</p>	
<p>Disclose a reconciliation of the numerators and the denominators of the basic and diluted per-share computations for income from continuing operations.</p> <p>References: <u>ASC 260-10-50-1(a)</u></p>	
<p>Disclose the effect that has been given to preferred dividends in arriving at income available to common stockholders in computing basic EPS.</p> <p>References: <u>ASC 260-10-50-1(b)</u></p>	
<p>Securities (including those issuable pursuant to contingent stock agreements) that could potentially dilute basic EPS in the future that were not included in the computation of diluted EPS because to do so would have been antidilutive for the period(s) presented. Full disclosure of the terms and conditions of these securities is required even if a security is not included in diluted EPS in the current period.</p> <p>References: <u>ASC 260-10-50-1(c)</u></p>	
<p>Disclose any transaction that occurs after the end of the most recent period, but before issuance of the financial statements that would have changed materially the number of common shares or potential common shares outstanding at the end of the period if the transaction had occurred before the end of the period.</p> <p>References: <u>ASC 260-10-50-2</u></p>	
<p>Disclose the details supporting the computation of earnings-per-share as an exhibit unless the computation is clearly set forth elsewhere in the document.</p> <p>References: <u>S-X 10-01(b)(2)</u></p> <p><u>S-K 601(b)(11)</u></p>	

Line Item(s)	Response
	<p>Note: It may be useful to disclose information about derivative transactions entered into in connection with the issuance of the contingently convertible securities in explaining the potential impact of the contingently convertible securities. That information might include the terms of those derivative transactions (including the terms of settlement), how those transactions relate to the contingently convertible securities, and the number of shares underlying the derivatives.</p> <p>References: <u>ASC 505-10-50-10</u></p>
Related Party Disclosures	
	<p>Financial statements shall include disclosures of material related party transactions, other than compensation arrangements, expense allowances, and other similar items in the ordinary course of business. However, disclosure of transactions that are eliminated in the preparation of consolidated or combined financial statements is not required in those statements. The disclosures shall include:</p> <p>References: <u>ASC 850-10-50-1</u></p>
	<p>The nature of the relationship(s) involved. (Disclose name of related party, if necessary, to understand the relationship.)</p> <p>References: <u>ASC 850-10-50-1(a)</u></p>
	<p>A description of the transactions, including transactions to which no amounts or nominal amounts were ascribed, for each of the periods for which income statements are presented, and such other information deemed necessary to an understanding of the effects of the transactions on the financial statements.</p> <p>References: <u>ASC 850-10-50-1(b)</u></p>
	<p>Note: The SEC staff has challenged instances where services necessary for the operation of the fund (such as investment management or custody) are contractually provided at no charge, requesting, in addition to disclosure, a "gross-up" on the face of the statement of operations, based on amounts charged either directly to investors or to other entities for those services. Because of the guidance within ASC 850, we consider either disclosure and recognition, or disclosure alone without recognition, to be acceptable under GAAP.</p>
	<p>The dollar amounts of transactions for each of the periods for which income statements are presented and the effects of any change in the method of establishing the terms from that used in the preceding period</p> <p>References: <u>ASC 850-10-50-1(c)</u></p>

Line Item(s)	Response
<p>Amounts due from or to related parties as of the date of each balance sheet presented and, if not otherwise apparent, the terms and manner of settlement</p> <p>References: <u>ASC 850-10-50-1(d)</u></p>	
<p>An entity that is a member of a group that files a consolidated tax return shall disclose in its separately issued financial statements:</p> <p>References: <u>ASC 850-10-50-1(e)</u></p>	
<p>The aggregate amount of current and deferred tax expense for each statement of earnings presented and the amount of any tax-related balances due to or from affiliates as of the date of each statement of financial position presented</p> <p>References: <u>ASC 740-10-50-17</u></p>	
<p>The principal provisions of the method by which the consolidated amount of current and deferred tax expense is allocated to members of the group and the nature and effect of any changes in that method (and in determining related balances to or from affiliates) during the years for which the above disclosures are presented.</p> <p>References: <u>ASC 740-10-50-17</u></p>	
<p>Disclose notes or accounts receivable from officers, employees, or affiliated entities. Such amounts are to be shown separately and not included under a general heading such as notes receivable or accounts receivable.</p> <p>References: <u>ASC 850-10-50-2</u></p>	
<p>Note: In some cases, aggregation of similar transactions by type of related party may be appropriate. Sometimes, the effect of the relationship between the parties may be so pervasive that disclosure of the relationship alone will be sufficient. If necessary to the understanding of the relationship, the name of the related party shall be disclosed.</p> <p>References: <u>ASC 850-10-50-3</u></p>	

Line Item(s)	Response
	<p>Note: It is not necessary to duplicate disclosures in a set of separate financial statements that is presented in the financial report of another entity (the primary reporting entity) if those separate financial statements also are consolidated or combined in a complete set of financial statements and both sets of financial statements are presented in the same financial report.</p> <p>References: ASC 850-10-50-4</p>
	<p>Note: Transactions involving related parties cannot be presumed to be carried out on an arm's-length basis, as the requisite conditions of competitive, free-market dealings may not exist. Representations about transactions with related parties, if made, shall not imply that the related party transactions were consummated on terms equivalent to those that prevail in arm's-length transactions unless such representations can be substantiated.</p> <p>References: ASC 850-10-50-5</p>
	<p>If the reporting entity and one or more other entities are under common ownership or management control and the existence of that control could result in operating results or financial position of the reporting entity significantly different from those that would have been obtained if the entities were autonomous, the nature of the control relationship shall be disclosed even though there are no transactions between the entities.</p> <p>References: ASC 850-10-50-6</p>
	<p>Note: It should be noted generally that all amounts receivable from officers and directors resulting from sales of stock or from other transactions (other than expense advances or sales on normal trade terms) should be separately stated in the balance sheet irrespective of whether such amounts may be shown as assets or are required to be reported as deductions from stockholders' equity.</p> <p>References: SAB Topic 4.E</p>
	<p>Note: An entity may receive a note, rather than cash, as a contribution to its equity. The transaction may be a sale of capital stock or a contribution to paid-in capital. Reporting the note as an asset is generally not appropriate, except in very limited circumstances in which there is substantial evidence of ability and intent to pay within a reasonably short period of time, for example, as discussed for public entities in paragraph 210-10-S99-1 (paragraphs 27 through 29), which requires a deduction of the receivable from equity. However, such notes may be recorded as an asset if collected in cash before the financial statements are issued or are available to be issued (as discussed in Section 855-10-25).</p> <p>References: SAB Topic 4.G</p>
Inventory disclosures	

Line Item(s)	Response
	<p>If not disclosed on the face of the balance sheet, disclose in the footnotes the components of inventory (raw materials, work in process, and finished goods).</p> <p>References: <u>S-X 10-01(a)(2)</u> <u>SAB Topic 6.G.2.a (q.2)</u></p>
<p>Inventory Costing Method:</p> <p>References: <u>ASC 270-10-45-6</u></p>	
	<p>Disclose the method to determine cost of goods sold during interim periods if different from that used at annual inventory dates.</p> <p>References: <u>ASC 270-10-45-5</u> <u>ASC 270-10-45-6</u></p>
	<p>For entities which use estimated gross profit rates to determine the cost of goods sold during interim periods or use other methods different from those used at annual inventory dates, disclose whether any significant adjustments have resulted from reconciliations with the annual physical inventory.</p> <p>References: <u>ASC 270-10-45-6</u></p>
	<p>If the LIFO method is used to determine cost of goods sold during interim periods, disclose parenthetically or in a note the income statement effect of a material LIFO liquidation if the liquidation is not expected to be replaced by year-end.</p> <p>References: <u>SAB Topic 11.F</u></p>
<p>Collaborative Arrangements</p>	
<p>In the period in which a collaborative arrangement is entered into (which may be an interim period), a participant to a collaborative arrangement shall disclose all of the following:</p> <p>References: <u>ASC 808-10-50-1</u></p>	
<p>Information about the nature and purpose of its collaborative arrangements</p> <p>References: <u>ASC 808-10-50-1</u></p>	

Line Item(s)	Response
<p>Its rights and obligations under the collaborative arrangements</p> <p>References: ASC 808-10-50-1</p>	
<p>The accounting policy for collaborative arrangements in accordance with Topic 235</p> <p>References: ASC 808-10-50-1</p>	
<p>The income statement classification and amounts attributable to transactions arising from the collaborative arrangement between participants for each period an income statement is presented.</p> <p>References: ASC 808-10-50-1</p>	
<p>Note: Information related to individually significant collaborative arrangements shall be disclosed separately.</p> <p>References: ASC 808-10-50-1</p>	
Own-Share Lending Arrangements Issued in Contemplation of Convertible Debt Issuance	
<p>An entity that enters into a share-lending arrangement on its own shares in contemplation of a convertible debt offering or other financing shall disclose all of the following. The disclosures must be made on an annual and interim basis in any period in which a share-lending arrangement is outstanding.</p> <p>References: ASC 470-20-50-2A</p>	
<p>A description of any outstanding share-lending arrangements on the entity's own stock</p> <p>References: ASC 470-20-50-2A</p>	
<p>All significant terms of the share-lending arrangement including all of the following: 1. The number of shares 2. The term 3. The circumstances under which cash settlement would be required 4. Any requirements for the counterparty to provide collateral.</p> <p>References: ASC 470-20-50-2A</p>	
<p>The entity's reason for entering into the share-lending arrangement</p> <p>References: ASC 470-20-50-2A</p>	

Line Item(s)	Response
<p>The fair value of the outstanding loaned shares as of the balance sheet date</p> <p>References: <u>ASC 470-20-50-2A</u></p>	
<p>The treatment of the share-lending arrangement for the purposes of calculating earnings per share</p> <p>References: <u>ASC 470-20-50-2A</u></p>	
<p>The unamortized amount of the issuance costs associated with the share-lending arrangement at the balance sheet date</p> <p>References: <u>ASC 470-20-50-2A</u></p>	
<p>The classification of the issuance costs associated with the share-lending arrangement at the balance sheet date</p> <p>References: <u>ASC 470-20-50-2A</u></p>	
<p>The amount of interest cost recognized relating to the amortization of the issuance cost associated with the share-lending arrangement for the reporting period</p> <p>References: <u>ASC 470-20-50-2A</u></p>	
<p>Any amounts of dividends paid related to the loaned shares that will not be reimbursed.</p> <p>References: <u>ASC 470-20-50-2A</u></p>	
<p>An entity that enters into a share-lending arrangement on its own shares in contemplation of a convertible debt offering or other financing shall also make the disclosures required by Topic 505.</p> <p>References: <u>ASC 470-20-50-2B</u></p>	

Line Item(s)	Response
	<p>In the period in which an entity concludes that it is probable that the counterparty to its share-lending arrangement will default, the entity shall disclose the amount of expense reported in the statement of earnings related to the default. The entity shall disclose in any subsequent period any material changes in the amount of expense as a result of changes in the fair value of the entity's shares or the probable recoveries. If default is probable but has not yet occurred, the entity shall disclose the number of shares related to the share-lending arrangement that will be reflected in basic and diluted earnings per share when the counterparty defaults.</p> <p>References: ASC 470-20-50-2C</p>
Variable Interest Entities	
	<p>A reporting entity that does not apply ASC 810 to one or more variable interest entities or potential variable interest entities because of the "information out" exception (see condition described in ASC 810-10-15-17(c)) must disclose the following:</p> <p>References: ASC 810-10-50-6</p>
	<p>The number of legal entities to which ASC 810 is not being applied and the reason why the information required to apply the guidance is not available.</p> <p>References: ASC 810-10-50-6(a)</p>
	<p>The nature, purpose, size (if available), and activities of the legal entities and the nature of the reporting entity's involvement with the legal entities.</p> <p>References: ASC 810-10-50-6(b)</p>
	<p>The reporting entity's maximum exposure to loss because of its involvement with the legal entities.</p> <p>References: ASC 810-10-50-6(c)</p>
	<p>The amount of income, expense, purchases, sales, or other measure of activity between the reporting entity and the legal entities for all periods presented. However, if it is not practical to present that information for prior periods that are presented in the first set of financial statements for which this requirement applies, the information for those prior periods is not required.</p> <p>References: ASC 810-10-50-6(d)</p>

Line Item(s)	Response
	<p>The principal objectives of ASC 810-10-50 required disclosures are to provide financial statement users with an understanding of all of the following: a. The significant judgments and assumptions made by a reporting entity in determining whether it must do any of the following: 1. Consolidate a variable interest entity (VIE) 2. Disclose information about its involvement in a VIE. b. The nature of restrictions on a consolidated VIE's assets and on the settlement of its liabilities reported by a reporting entity in its statement of financial position, including the carrying amounts of such assets and liabilities. c. The nature of, and changes in, the risks associated with a reporting entity's involvement with the VIE. d. How a reporting entity's involvement with the VIE affects the reporting entity's financial position, financial performance, and cash flows.</p> <p>References: ASC 810-10-50-2AA</p>
	<p>Consider the overall objectives noted above in providing the disclosures required by ASC 810-10-50. To achieve those objectives, consider supplementing the disclosures otherwise required by ASC 810-10-50, depending on the facts and circumstances surrounding the VIE and a reporting entity's interest in that VIE.</p> <p>References: ASC 810-10-50-2AB</p>
	<p>The disclosures required by ASC 810-10-50 may be provided in more than one note to the financial statements, as long as the objectives in ASC 810-10-50-2AA are met. If the disclosures are provided in more than one note to the financial statements, the reporting entity shall provide a cross reference to the other notes to the financial statements that provide the disclosures prescribed in ASC 810-10-50 for similar VIEs.</p> <p>References: ASC 810-10-50-2AC</p>
	<p>Disclosures about VIEs may be reported in the aggregate for similar entities if separate reporting would not provide more useful information to users. A reporting entity must disclose how similar entities are aggregated and must distinguish between:</p> <p>References: ASC 810-10-50-9</p>
	<p>VIEs that are not consolidated as the reporting entity is not the primary beneficiary, but has a variable interest.</p> <p>References: ASC 810-10-50-9(a)</p>
	<p>VIEs that are consolidated.</p> <p>References: ASC 810-10-50-9(b)</p>

Line Item(s)	Response
	<p>Note: The reporting entity shall consider quantitative and qualitative information about the different risk and reward characteristics of each VIE and the significance of each VIE to the entity. The disclosures shall be presented in a manner that clearly and fully explains to financial statement users the nature and extent of an entity's involvement with VIEs.</p> <p>References: <u>ASC 810-10-50-9</u></p>
	<p>Note: A reporting entity shall determine, in light of the facts and circumstances, how much detail it shall provide to satisfy this Section's disclosure requirements, how much emphasis it places on different aspects of the requirements, and how it aggregates information to display its overall involvements with VIEs with different risk characteristics. The reporting entity must strike a balance between obscuring important information as a result of too much aggregation and overburdening financial statements with excessive detail that may not assist financial statement users to understand the reporting entity's financial position. For example, a reporting entity shall not obscure important information by including it with a large amount of insignificant detail. Similarly, a reporting entity shall not disclose information that is so aggregated that it obscures important differences between the types of involvement or associated risks.</p> <p>References: <u>ASC 810-10-50-10</u></p>
	<p>A reporting entity that is a primary beneficiary of a VIE or a reporting entity that holds a variable interest in a VIE but is not the entity's primary beneficiary shall disclose all of the following:</p> <p>References: <u>ASC 810-10-50-5A</u></p>
	<p>Its methodology for determining whether the reporting entity is the primary beneficiary of a VIE, including, but not limited to, significant judgments and assumptions made. One way to meet this disclosure requirement would be to provide information about the types of involvements a reporting entity considers significant, supplemented with information about how the significant involvements were considered in determining whether the reporting entity is the primary beneficiary.</p> <p>References: <u>ASC 810-10-50-5A(a)</u></p>
	<p>If facts and circumstances change such that the conclusion to consolidate a VIE has changed in the most recent financial statements (for example, the VIE was previously consolidated and is not currently consolidated), the primary factors that caused the change and the effect on the reporting entity's financial statements.</p> <p>References: <u>ASC 810-10-50-5A(b)</u></p>

Line Item(s)	Response
	<p>Whether the reporting entity has provided financial or other support (explicitly or implicitly) during the periods presented to the VIE that it was not previously contractually required to provide or whether the reporting entity intends to provide that support, including both of the following:</p> <p>References: <u>ASC 810-10-50-5A(c)</u></p>
	<p>The type and amount of support, including situations in which the reporting entity assisted the VIE in obtaining another type of support.</p> <p>References: <u>ASC 810-10-50-5A(c)(1)</u>.</p>
	<p>The primary reasons for providing the support.</p> <p>References: <u>ASC 810-10-50-5A(c)(2)</u>.</p>
	<p>Qualitative and quantitative information about the reporting entity's involvement (giving consideration to both explicit arrangements and implicit variable interests) with the VIE, including, but not limited to, the nature, purpose, size, and activities of the VIE, including how the VIE is financed.</p> <p>References: <u>ASC 810-10-50-5A(d)</u>.</p>
	<p>Note: A VIE may issue voting equity interests, and the entity that holds a majority voting interest may also be the primary beneficiary of the VIE. If so, and if the VIE meets the definition of a business and the VIE's assets can be used for purposes other than the settlement of the VIE's obligations, the disclosures in (f) above are not required.</p> <p>References: <u>ASC 810-10-50-5B</u></p>
	<p>The primary beneficiary of a VIE that is a business shall provide the disclosures required under ASC 805, Business Combinations. The primary beneficiary of a VIE that is not a business shall disclose the amount of any gain or loss recognized on the initial consolidation of the VIE.</p> <p>References: <u>ASC 810-10-50-3</u></p>
	<p>In addition to other disclosures that are required for variable interest holders in VIEs, the primary beneficiary of a VIE must disclose all of the following:</p> <p>References: <u>ASC 810-10-50-3</u></p>

Line Item(s)	Response
	<p>The carrying amounts and classification of the VIE's assets and liabilities in the statement of financial position that are consolidated, including qualitative information about the relationship(s) between those assets and liabilities. For example, if the VIE's assets can be used only to settle obligations of the VIE, the reporting entity shall disclose qualitative information about the nature of the restrictions on those assets.</p> <p>References: <u>ASC 810-10-50-3(bb)</u></p>
	<p>Lack of recourse if creditors (or beneficial interest holders) of a consolidated VIE have no recourse to the general credit of the primary beneficiary.</p> <p>References: <u>ASC 810-10-50-3(c)</u></p>
	<p>Terms of arrangements, giving consideration to both explicit arrangements and implicit variable interests, that could require the reporting entity to provide financial support (for example, liquidity arrangements and obligations to purchase assets) to the VIE, including events or circumstances that could expose the reporting entity to a loss.</p> <p>References: <u>ASC 810-10-50-3(d)</u></p>
	<p>Note: A VIE may issue voting equity interests, and the entity that holds a majority voting interest may also be the primary beneficiary of the VIE. If so, and if the VIE meets the definition of a business and the VIE's assets can be used for purposes other than the settlement of the VIE's obligations, the disclosures above are not required.</p> <p>References: <u>ASC 810-10-50-3</u></p>
	<p>In addition to disclosures required by other guidance, a reporting entity that holds a variable interest in a VIE, but is not the VIE's primary beneficiary, shall disclose all of the following:</p> <p>References: <u>ASC 810-10-50-4</u></p>
	<p>The carrying amounts and classification of the assets and liabilities in the reporting entity's statement of financial position that relate to the reporting entity's variable interest in the VIE.</p> <p>References: <u>ASC 810-10-50-4(a)</u></p>
	<p>The reporting entity's maximum exposure to loss as a result of its involvement with the VIE, including both of the following:</p> <p>References: <u>ASC 810-10-50-4(b)</u></p>

Line Item(s)	Response
<p>How the maximum exposure is determined</p> <p>References: <u>ASC 810-10-50-4(b)</u></p>	
<p>The significant sources of the reporting entity's exposure to the VIE.</p> <p>References: <u>ASC 810-10-50-4(b)</u></p>	
<p>If the reporting entity's maximum exposure to loss as a result of its involvement with the VIE cannot be quantified, that fact shall be disclosed.</p> <p>References: <u>ASC 810-10-50-4(b)</u></p>	
<p>A tabular comparison of the carrying amounts of the assets and liabilities and the reporting entity's maximum exposure to loss as detailed in the disclosure requirements above. The reporting entity should provide qualitative and quantitative information to allow financial statement users to understand the differences between the two amounts. That discussion shall include, but is not limited to, the terms of arrangements, giving consideration to both explicit arrangements and implicit variable interests, that could require the reporting entity to provide financial support (for example, liquidity arrangements and obligations to purchase assets) to the VIE, including events or circumstances that could expose the reporting entity to a loss.</p> <p>References: <u>ASC 810-10-50-4(c)</u></p>	
<p>Information about any liquidity arrangements, guarantees and/or other commitments by third parties that may affect the fair value or risk of the reporting entity's variable interest in the VIE is encouraged.</p> <p>References: <u>ASC 810-10-50-4(d)</u></p>	
<p>If applicable, significant factors considered and judgments made in determining that the power to direct the activities of a VIE that most significantly impact the VIE's economic performance is shared in accordance with the guidance in ASC 810-10-25-38D.</p> <p>References: <u>ASC 810-10-50-4(e)</u></p>	
<p>Collateralized Financing Entities:</p>	

A reporting entity that consolidates a collateralized financing entity and measures the financial assets and the financial liabilities using the measurement alternative in ASC 810-10-30-10 through 30-15 and ASC 810-10-35-6 through 35-8 shall disclose the information required by ASC 820 on fair value measurement and ASC 825 on financial instruments for the financial assets and the financial liabilities of the consolidated collateralized financing entity.

References: ASC 810-10-50-20

For the less observable of the fair value of the financial assets and the fair value of the financial liabilities of the collateralized financing entity that is measured in accordance with the measurement alternative in ASC 810-10-30-10 through 30-15 and ASC 810-10-35-6 through 35-8, a reporting entity shall disclose that the amount was measured on the basis of the more observable of the fair value of the financial liabilities and the fair value of the financial assets.

References: ASC 810-10-50-21

Note: The disclosures requirements above (see ASC 810-10-50-20 through 50-21) do not apply to the financial assets and the financial liabilities that are incidental to the operations of the collateralized financing entity and have carrying values that approximate fair value.

References: ASC 810-10-50-22

A reporting entity shall not consolidate a legal entity that is required to comply with or operate in accordance with requirements that are similar to those included in Rule 2a-7 of the Investment Company Act of 1940 for registered money market funds. However, the following disclosure requirements will apply:

References: ASC 810-10-15-12(f)

A reporting entity subject to the scope exception shall disclose any explicit arrangements to provide financial support to legal entities that are required to comply with or operate in accordance with requirements that are similar to those included in Rule 2a-7, as well as any instances of such support provided for the periods presented in the performance statement. For purposes of applying this disclosure requirement, the types of support that should be considered include, but are not limited to, any of the following: 1. Capital contributions (except pari passu investments) 2. Standby letters of credit 3. Guarantees of principal and interest on debt investments held by the legal entity 4. Agreements to purchase financial assets for amounts greater than fair value (for instance, at amortized cost or par value when the financial assets experience significant credit deterioration) 5. Waivers of fees, including management fees.

References: ASC 810-10-15-12(f)(2)

Line Item(s)	Response
Applying Variable Interest Entities Guidance to Common Control Leasing Arrangements	
<p>A private company lessee that does not apply the requirements of the Variable Interest Entities Subsections to one or more lessor legal entities because it meets the criteria in ASC 810-10-15-17AB should disclose the following:</p> <p>References: <u>ASC 810-10-50-2AD</u></p>	
<p>The amount and key terms of liabilities recognized by the lessor legal entity that expose the private company lessee to providing financial support to the legal entity.</p> <p>References: <u>ASC 810-10-50-2AD(a)</u></p>	
<p>Note: For example, a private company lessee exposed to debt of the legal entity should disclose information such as the amount of debt, interest rate, maturity, pledged collateral, and guarantees associated with the debt.</p> <p>References: <u>ASC 810-10-50-2AD(a)</u></p>	
<p>A qualitative description of circumstances (for example, certain commitments and contingencies) not recognized in the financial statements of the lessor legal entity that expose the private company lessee to providing financial support to the legal entity.</p> <p>References: <u>ASC 810-10-50-2AD(b)</u></p>	
<p>In applying the disclosure guidance noted above (see ASC 810-10-50-2AD), a private company lessee should consider exposures through implicit guarantees. The determination as to whether an implicit guarantee exists is based on facts and circumstances. Those facts and circumstances include, but are not limited to, whether: a. There is an economic incentive for the private company lessee to act as a guarantor or to make funds available. b. Such actions have happened in similar situations in the past. c. The private company lessee acting as a guarantor or making funds available would be considered a conflict of interest or illegal.</p> <p>References: <u>ASC 810-10-50-2AE</u></p>	

Line Item(s)	Response
<p>Note: In disclosing information about the lessor legal entity, a private company lessee should present the disclosures in combination with the disclosures required by other guidance (for example, in ASC 460 on guarantees, ASC 850 on related party disclosures, and ASC 840 or ASC 842, as applicable, on leases). Those disclosures could be combined in a single note or by including cross-references within the notes to financial statements.</p> <p>References: <u>ASC 810-10-50-2AF</u></p>	
<p>Health Care Entities</p>	
<p>The existence of the trust fund and whether it is irrevocable shall be disclosed in the financial statements.</p> <p>References: <u>ASC 954-810-50-1</u></p>	
<p>Deconsolidation of a Subsidiary</p> <p>References: <u>ASC 810-10-50-1B</u></p>	
<p>In the period that either a subsidiary is deconsolidated or a group of assets is derecognized in accordance with paragraph 810-10-40-3A, the parent shall disclose all of the following:</p>	
<p>The amount of any gain or loss recognized in accordance with paragraph 810-10-40-5</p>	
<p>The portion of any gain or loss related to the remeasurement of any retained investment in the former subsidiary or group of assets to its fair value</p>	
<p>The caption in the income statement in which the gain or loss is recognized unless separately presented on the face of the income statement</p>	
<p>A description of the valuation technique(s) used to measure the fair value of any direct or indirect retained investment in the former subsidiary or group of assets</p>	
<p>Information that enables users of the parent's financial statements to assess the inputs used to develop the fair value in item (d)</p>	
<p>The nature of continuing involvement with the subsidiary or entity acquiring the group of assets after it has been deconsolidated or derecognized</p>	
<p>Whether the transaction that resulted in the deconsolidation or derecognition was with a related party</p>	

Line Item(s)	Response
Whether the former subsidiary or entity acquiring a group of assets will be a related party after deconsolidation.	
Noncontrolling Interests	
<p>Present, as a separate line item, the noncontrolling interest in the consolidated statement of financial position within equity, separately from the parent's equity. That amount shall be clearly identified and labeled, for example, as noncontrolling interest in subsidiaries (see ASC 810-10-55-4I). An entity with noncontrolling interests in more than one subsidiary may present those interests in aggregate in the consolidated financial statements.</p> <p>References: ASC 810-10-45-16</p>	
<p>Paragraph 810-10-50-1A(a) states that, if an entity has an outstanding noncontrolling interest, amounts for both net income and comprehensive income attributable to the parent and net income and comprehensive income attributable to the noncontrolling interest in a less-than-wholly-owned subsidiary shall be reported in the financial statement(s) in which net income and comprehensive income are presented in addition to presenting consolidated net income and comprehensive income. For more guidance, see paragraph 810-10-50-1A(c).</p> <p>References: ASC 220-10-45-5</p>	
<p>Separately, on the face of the consolidated financial statements:</p> <p>References: ASC 810-10-50-1A</p>	
<p>The amounts of consolidated net income and consolidated comprehensive income; and</p> <p>References: ASC 810-10-50-1A</p>	
<p>The related amounts of each attributable to the parent and the noncontrolling interest.</p> <p>References: ASC 810-10-50-1A</p>	
<p>Either in the notes or on the face of the consolidated income statement, amounts attributable to the parent for any of the following, if reported in the consolidated financial statements:</p> <p>References: ASC 810-10-50-1A</p>	

Line Item(s)	Response
<p>Income from continuing operations.</p> <p>References: ASC 810-10-50-1A</p>	
<p>Discontinued operations.</p> <p>References: ASC 810-10-50-1A</p>	
<p>Either in the consolidated statement of changes in equity, if presented, or in the notes to consolidated financial statements, a reconciliation at the beginning and the end of the period of the carrying amount of total equity (net assets), equity (net assets) attributable to the parent, and equity (net assets) attributable to the noncontrolling interest. That reconciliation shall separately disclose:</p> <p>References: ASC 810-10-50-1A</p>	
<p>Net income.</p> <p>References: ASC 810-10-50-1A</p>	
<p>Transactions with owners acting in their capacity as owners, showing separately contributions from and distributions to owners.</p> <p>References: ASC 810-10-50-1A</p>	
<p>Each component of other comprehensive income.</p> <p>References: ASC 810-10-50-1A</p>	
<p>In notes to the consolidated financial statements, a separate schedule that shows the effects of any changes in a parent's ownership interest in a subsidiary on the equity attributable to the parent.</p> <p>References: ASC 810-10-50-1A</p>	
Registration Payment Agreements	
<p>The issuer of a registration payment arrangement shall disclose the following information about each registration payment arrangement or each group of similar arrangements:</p> <p>References: ASC 825-20-50-1</p>	

Line Item(s)	Response
<p>The nature of the registration payment arrangement, including:</p> <p>References: <u>ASC 825-20-50-1</u></p>	
<p>The approximate term of the arrangement.</p> <p>References: <u>ASC 825-20-50-1</u></p>	
<p>The financial instrument(s) subject to the arrangement, and</p> <p>References: <u>ASC 825-20-50-1</u></p>	
<p>The events or circumstances that would require the issuer to transfer consideration under the arrangement.</p> <p>References: <u>ASC 825-20-50-1</u></p>	
<p>Any settlement alternatives contained in the terms of the registration payment arrangement, including the party that controls the settlement alternatives.</p> <p>References: <u>ASC 825-20-50-1</u></p>	
<p>The maximum potential amount of consideration, undiscounted, that the issuer could be required to transfer under the registration payment arrangement (including the maximum number of shares that may be required to be issued).</p> <p>References: <u>ASC 825-20-50-1</u></p>	
<p>If the terms of the arrangement provide for no limitation to the maximum potential consideration (including shares) to be transferred, the fact shall be disclosed.</p> <p>References: <u>ASC 825-20-50-1</u></p>	
<p>The current carrying amount of the liability representing the issuer's obligations under the registration payment arrangement.</p> <p>References: <u>ASC 825-20-50-1</u></p>	

Line Item(s)	Response
<p>The income statement classification of any gains or losses resulting from changes in the carrying amount of the issuer's obligation under the registration payment arrangement.</p> <p>References: ASC 825-20-50-1</p>	
<p>Disclosures of Uncertainties about an Entity's Ability to Continue as a Going Concern</p> <p>References: ASC 205-40-50</p>	
<p>If, after considering management's plans, substantial doubt about an entity's ability to continue as a going concern is alleviated as a result of consideration of management's plans, an entity shall disclose in the footnotes information that enables users of the financial statements to understand all of the following (or refer to similar information disclosed elsewhere in the footnotes):</p> <p>References: ASC 205-40-50-12</p>	
<p>Principal conditions or events that raised substantial doubt about the entity's ability to continue as a going concern (before consideration of management's plans).</p>	
<p>Management's evaluation of the significance of those conditions or events in relation to the entity's ability to meet its obligations.</p>	
<p>Management's plans that alleviated substantial doubt about the entity's ability to continue as a going concern.</p>	
<p>If, after considering management's plans, substantial doubt about an entity's ability to continue as a going concern is not alleviated, the entity shall include a statement in the footnotes indicating that there is substantial doubt about the entity's ability to continue as a going concern within one year after the date that the financial statements are issued. Additionally, the entity shall disclose information that enables users of the financial statements to understand all of the following:</p> <p>References: ASC 205-40-50-13</p>	
<p>Principal conditions or events that raised substantial doubt about the entity's ability to continue as a going concern.</p>	
<p>Management's evaluation of the significance of those conditions or events in relation to the entity's ability to meet its obligations.</p>	

Line Item(s)	Response
	<p>Management's plans that are intended to mitigate the conditions or events that raise substantial doubt about the entity's ability to continue as a going concern.</p>
	<p>If conditions or events continue to raise substantial doubt about an entity's ability to continue as a going concern in subsequent annual or interim reporting periods, the entity shall continue to provide the required disclosures in ASC 205-40-50-12 through 50-13 in those subsequent periods. Disclosures should become more extensive as additional information becomes available about the relevant conditions or events and about management's plans.</p> <p>References: ASC 205-40-50-14</p>
	<p>An entity shall provide appropriate context and continuity in explaining how conditions or events have changed between reporting periods.</p> <p>References: ASC 205-40-50-14</p>
	<p>For the period in which substantial doubt no longer exists (before or after consideration of management's plans), an entity shall disclose how the relevant conditions or events that raised substantial doubt were resolved.</p> <p>References: ASC 205-40-50-14</p>
Liquidation Basis of Accounting	
	<p>For entities that determine liquidation is imminent during annual and interim reporting periods, an entity shall make all disclosures required by other Topics under GAAP that are relevant to understanding the entity's statement of net assets in liquidation and statement of changes in net assets in liquidation. The disclosures shall convey information about the amount of cash or other consideration that an entity expects to collect and the amount that the entity is obligated or expects to be obligated (in the case of the accruals described in ASC 205-30-25-6 through 25-7) to pay during the course of liquidation.</p> <p>References: ASC 205-30-50-1</p>
	<p>At a minimum, an entity shall disclose all of the following when it prepares financial statements using the liquidation basis of accounting:</p> <p>References: ASC 205-30-50-2</p>

Line Item(s)	Response
	<p>That the financial statements are prepared using the liquidation basis of accounting, including the facts and circumstances surrounding the adoption of the liquidation basis of accounting and the entity's determination that liquidation is imminent.</p> <p>References: <u>ASC 205-30-50-2</u></p>
	<p>A description of the entity's plan for liquidation, including a description of each of the following:</p> <p>References: <u>ASC 205-30-50-2</u></p>
	<p>The manner by which it expects to dispose of its assets and other items it expects to sell that it had not previously recognized as assets (for example, trademarks).</p> <p>References: <u>ASC 205-30-50-2</u></p>
	<p>The manner by which it expects to settle its liabilities.</p> <p>References: <u>ASC 205-30-50-2</u></p>
	<p>The expected date by which the entity expects to complete its liquidation.</p> <p>References: <u>ASC 205-30-50-2</u></p>
	<p>The methods and significant assumptions used to measure assets and liabilities, including any subsequent changes to those methods and assumptions.</p> <p>References: <u>ASC 205-30-50-2</u></p>
	<p>The type and amount of costs and income accrued in the statement of net assets in liquidation and the period over which those costs are expected to be paid or income earned.</p> <p>References: <u>ASC 205-30-50-2</u></p>
Adoption of New Standards	
Revenue from contracts with customers (ASC 606)	
For entities that adopted ASC 606 and related ASUs in a prior fiscal year, disclose the following:	

Line Item(s)	Response
<p>A disaggregation of revenue for the period, see ASC 606-10-50-5 through 50-6 and ASC 606-10-55-89 through 55-91.</p> <p>References: <u>ASC 270-10-50-1A(a)</u>.</p>	
<p>The opening and closing balances of receivables, contract assets, and contract liabilities from contracts with customers (if not otherwise separately presented or disclosed), see ASC 606-10-50-8(a).</p> <p>References: <u>ASC 270-10-50-1A(b)</u>.</p>	
<p>Revenue recognized in the reporting period that was included in the contract liability balance at the beginning of the period, see ASC 606-10-50-8(b).</p> <p>References: <u>ASC 270-10-50-1A(c)</u>.</p>	
<p>Revenue recognized in the reporting period from performance obligations satisfied (or partially satisfied) in previous periods (for example, changes in transaction price), see ASC 606-10-50-12A.</p> <p>References: <u>ASC 270-10-50-1A(d)</u>.</p>	
<p>Information about the entity's remaining performance obligations as of the end of the reporting period, see ASC 606-10-50-13 through 50-15.</p> <p>References: <u>ASC 270-10-50-1A(e)</u>.</p>	
<p>For entities that adopted ASC 606 and related ASUs in the current fiscal year, disclose the following:</p>	
<p>Present contracts for which performance by either party is complete in the statement of financial position as a contract asset or a contract liability, depending on the relationship between the entity's performance and the customer's payment.</p> <p>References: <u>ASC 606-10-45-1</u></p>	
<p>Present any unconditional rights to consideration as a receivable. A right to consideration is unconditional if only the passage of time is required before payment of that consideration is due.</p> <p>References: <u>ASC 606-10-45-1</u></p>	

Line Item(s)	Response
<p>Present as a contract liability an entity's obligation to transfer goods or services to a customer for which the entity has received consideration from the customer or an amount of consideration from the customer is due and unconditional (whichever is earlier).</p> <p>References: ASC 606-10-45-2</p>	
<p>Present as a contract asset, excluding any amounts presented as a receivable, an entity's right to consideration in exchange for goods or services that the entity has transferred to the customer.</p> <p>References: ASC 606-10-45-3</p>	
<p>Present and disclose any impairments of contract assets in accordance with Topic 310.</p> <p>References: ASC 606-10-45-3</p>	
<p>Present as an expense (e.g., an impairment loss) any difference between the measurement of a receivable in accordance with Topic 310 and the corresponding amount of revenue recognized.</p> <p>References: ASC 606-10-45-4</p>	
<p>Topic 606 uses the terms contract asset and contract liability but does not prohibit an entity from using alternative descriptions in the statement of financial position for those items. Provide sufficient information for a user of the financial statements to distinguish between receivables and contract assets if an entity uses an alternative description for a contract asset.</p> <p>References: ASC 606-10-45-5</p>	
<p>Disclose qualitative and quantitative information about all of the following:</p> <p>References: ASC 606-10-50-1</p>	
<p>An entity's contracts with customers.</p> <p>References: ASC 606-10-50-1(a)</p>	
<p>The significant judgments, and changes in the judgments, made in applying the guidance in Topic 606 to those contracts.</p> <p>References: ASC 606-10-50-1(b)</p>	

Line Item(s)	Response
<p>Any assets recognized from the costs to obtain or fulfill a contract with a customer in accordance with Subtopic 340-40.</p> <p>References: <u>ASC 606-10-50-1(c)</u></p>	
<p>Judgment is required to determine the level of detail necessary to satisfy the disclosure objective and how much emphasis to place on each of the various requirements. Disclosures should be aggregated or disaggregated so that useful information is not obscured by either the inclusion of a large amount of insignificant detail or the aggregation of items that have substantially different characteristics.</p> <p>References: <u>ASC 606-10-50-2</u></p>	
<p>Disclosures are required for each reporting period for which a statement of comprehensive income (statement of activities) is presented and as of each reporting period for which a statement of financial position is presented. An entity need not disclose information in accordance with Topic 606 if it has provided the information in accordance with another Topic.</p> <p>References: <u>ASC 606-10-50-3</u></p>	
<p>Disclose all of the following amounts for the reporting period unless those amounts are presented separately in the statement of comprehensive income (statement of activities) in accordance with other Topics:</p> <p>References: <u>ASC 606-10-50-4</u></p>	
<p>Revenue recognized from contracts with customers, which shall be disclosed separately from other sources of revenue.</p> <p>References: <u>ASC 606-10-50-4(a)</u></p>	
<p>If ASU 2016-13 has not been adopted in the current or prior fiscal year, disclose any impairment losses recognized (in accordance with Topic 310) on any receivables or contract assets arising from an entity's contracts with customers, which shall be disclosed separately from impairment losses from other contracts.</p> <p>References: <u>ASC 606-10-50-4(b)</u></p>	

Line Item(s)	Response
<p>If ASU 2016-13 has been adopted in the current or prior fiscal year, disclose credit losses recorded (in accordance with Subtopic 326-20 on financial instruments measured at amortized cost) on any receivables or contract assets arising from an entity's contracts with customers, which the entity shall disclose separately from credit losses from other contracts.</p> <p>References: ASC 606-10-50-4(b)</p>	
<p>Disclose revenue recognized from contracts with customers disaggregated into categories that depict how the nature, amount, timing, and uncertainty of revenue and cash flows are affected by economic factors.</p> <p>References: ASC 606-10-50-5</p>	
<p>Disclose sufficient information to enable users of financial statements to understand the relationship between the disclosure of disaggregated revenue in accordance with Topic 606 and revenue information that is disclosed for each reportable segment, if the entity applies Topic 280 on segment reporting.</p> <p>References: ASC 606-10-50-6</p>	
<p>An entity (except for a public business entity, a not-for-profit entity that has issued, or is a conduit bond obligor for, securities that are traded, listed, or quoted on an exchange or an over-the-counter market, or an employee benefit plan that files or furnishes financial statements with or to the Securities and Exchange Commission (SEC)), may elect not to apply the quantitative disaggregation disclosure guidance in the disclosure section Disaggregation of Revenue. If an entity elects not to provide those disclosures, disclose, at a minimum:</p> <p>References: ASC 606-10-50-7</p>	
<p>Revenue disaggregated according to the timing of transfer of goods or services (for example, revenue from goods or services transferred to customers at a point in time and revenue from goods or services transferred to customers over time).</p> <p>References: ASC 606-10-50-7</p>	
<p>Qualitative information about how economic factors (such as type of customer, geographical location of customers, and type of contract) affect the nature, amount, timing, and uncertainty of revenue and cash flows.</p> <p>References: ASC 606-10-50-7</p>	

Line Item(s)	Response
<p>Disclose all of the following:</p> <p>References: <u>ASC 606-10-50-8</u></p>	
<p>The opening and closing balances of receivables, contract assets, and contract liabilities from contracts with customers, if not otherwise separately presented and disclosed.</p> <p>References: <u>ASC 606-10-50-8(a)</u></p>	
<p>Revenue recognized in the reporting period that was included in the contract liability balance at the beginning of the period.</p> <p>References: <u>ASC 606-10-50-8(b)</u></p>	
<p>Explain, using quantitative and/or qualitative information, how the timing of satisfaction of performance obligations relates to the typical timing of payment and the effect that those factors have on the contract asset and the contract liability balances.</p> <p>References: <u>ASC 606-10-50-9</u></p>	
<p>Explain, using quantitative and qualitative information, the significant changes in the contract asset and the contract liability balances during the reporting period. Examples of changes include any of the following:</p> <p>References: <u>ASC 606-10-50-10</u></p>	
<p>Changes due to business combinations.</p> <p>References: <u>ASC 606-10-50-10(a)</u></p>	
<p>Cumulative catch-up adjustments to revenue that affect the corresponding contract asset or contract liability, including adjustments arising from:</p> <p>References: <u>ASC 606-10-50-10(b)</u></p>	
<p>A change in the measure of progress.</p> <p>References: <u>ASC 606-10-50-10(b)</u></p>	

Line Item(s)	Response
<p>A change in the estimate of transaction price.</p> <p>References: <u>ASC 606-10-50-10(b)</u>.</p>	
<p>Changes in the assessment of whether an estimate of variable consideration is constrained.</p> <p>References: <u>ASC 606-10-50-10(b)</u>.</p>	
<p>A contract modification.</p> <p>References: <u>ASC 606-10-50-10(b)</u>.</p>	
<p>Impairment of a contract asset.</p> <p>References: <u>ASC 606-10-50-10(c)</u>.</p>	
<p>A change in the time frame for a right to consideration to become unconditional (that is, for a contract asset to be reclassified to a receivable).</p> <p>References: <u>ASC 606-10-50-10(d)</u>.</p>	
<p>A change in the time frame for a performance obligation to be satisfied (that is, for the recognition of revenue arising from a contract liability).</p> <p>References: <u>ASC 606-10-50-10(e)</u>.</p>	
<p>Other.</p>	
<p>An entity (except for a public business entity, a not-for-profit entity that has issued, or is a conduit bond obligor for, securities that are traded, listed, or quoted on an exchange or an over-the-counter market, or an employee benefit plan that files or furnishes financial statements with or to the Securities and Exchange Commission (SEC)), may elect not to provide any or all of the disclosures in the disclosure section Contract Balances as well as the disclosure requirements of 606-10-50-12A, which requires disclosure of revenue recognized in the reporting period from performance obligations satisfied (or partially satisfied) in previous periods (e.g., changes in transaction price). However, if an entity elects not to provide these disclosures, disclose:</p> <p>References: <u>ASC 606-10-50-11</u></p>	

Line Item(s)	Response
	<p>The opening and closing balances of receivables, contract assets, and contract liabilities from contracts with customers, if not otherwise separately presented or disclosed.</p> <p>References: <u>ASC 606-10-50-11</u></p>
	<p>Disclose information about performance obligations in contracts with customers, including a description of all of the following:</p> <p>References: <u>ASC 606-10-50-12</u></p>
	<p>When performance obligations are typically satisfied, for example, upon shipment ,upon delivery, as services are rendered, upon completion of service, in a bill-and-hold arrangement.</p> <p>References: <u>ASC 606-10-50-12(a)</u></p>
	<p>The significant payment terms (for example, when payment typically is due, whether the contract has a significant financing component, whether the consideration amount is variable, and whether the estimate of variable consideration is typically constrained in accordance with paragraphs 606-10-32-11 through 32-13).</p> <p>References: <u>ASC 606-10-50-12(b)</u></p>
	<p>The nature of the goods or services that the entity has promised to transfer, highlighting any performance obligations to arrange for another party to transfer goods or services (that is, if the entity is acting as an agent).</p> <p>References: <u>ASC 606-10-50-12(c)</u></p>
	<p>Obligations for returns, refunds, and other similar obligations.</p> <p>References: <u>ASC 606-10-50-12(d)</u></p>
	<p>Types of warranties and related obligations.</p> <p>References: <u>ASC 606-10-50-12(e)</u></p>
	<p>Disclose revenue recognized in the reporting period from performance obligations satisfied (or partially satisfied) in previous periods (for example, changes in transaction price).</p> <p>References: <u>ASC 606-10-50-12A</u></p>

Line Item(s)	Response
<p>Disclose the following information about remaining performance obligations:</p> <p>References: <u>ASC 606-10-50-13</u></p>	
<p>The aggregate amount of the transaction price allocated to performance obligations that are unsatisfied (or partially unsatisfied) as of the end of the reporting period.</p> <p>References: <u>ASC 606-10-50-13(a)</u></p>	
<p>An explanation of when such aggregate amount of the transaction price allocated to unsatisfied (or partially unsatisfied) performance obligations is expected to be recognized as revenue, which can be disclosed in either of the following ways: (1) On a quantitative basis using the time bands that would be most appropriate for the duration of the remaining performance obligations (2) By using qualitative information.</p> <p>References: <u>ASC 606-10-50-13(b)</u></p>	
<p>Disclosure relating to the aggregate amount of the transaction price allocated to performance obligations that are unsatisfied (or partially unsatisfied) as of the end of the reporting period (including an explanation of when such aggregate amount of the transaction price is expected to be recognized as revenue) is not required if either of the following conditions is met for the performance obligation:</p> <p>References: <u>ASC 606-10-50-14</u></p>	
<p>The performance obligation is part of a contract that has an original expected duration of one year or less.</p> <p>References: <u>ASC 606-10-50-14(a)</u></p>	
<p>Revenue is recognized from the satisfaction of the performance obligation in accordance with the "right to invoice" practical expedient.</p> <p>References: <u>ASC 606-10-50-14(b)</u></p>	
<p>The "right to invoice" practical expedient may be applied if an entity has a right to consideration from a customer in an amount that corresponds directly with the value to the customer of the entity's performance completed to date (for example, a service contract in which an entity bills a fixed amount for each hour of service provided to the customer).</p>	

Line Item(s)	Response
	<p>Disclosure relating to the aggregate amount of the transaction price allocated to performance obligations that are unsatisfied (or partially unsatisfied) as of the end of the reporting period (including an explanation of when such aggregate amount of the transaction price is expected to be recognized as revenue) is not required if either of the following conditions is met for variable consideration:</p> <p>References: ASC 606-10-50-14A</p>
	<p>The variable consideration is accounted for in accordance with the sales-based or usage-based royalty guidance.</p> <p>References: ASC 606-10-50-14A(a)</p>
	<p>The variable consideration is allocated entirely to a wholly unsatisfied performance obligation or to a wholly unsatisfied promise to transfer a distinct good or service that forms part of a series of distinct goods or services, for which the allocation of variable consideration criteria in paragraph 606-10-32-40 have been met.</p> <p>References: ASC 606-10-50-14A(b)</p>
	<p>The "right to invoice" practical expedient and the sales-based or usage-based royalty guidance must not be applied to fixed consideration.</p> <p>References: ASC 606-10-50-14B ASC 606-10-50-14A ASC 606-10-55-18</p>
	<p>Disclose which of the following optional exemptions are being applied:</p> <p>References: ASC 606-10-50-15</p>
	<p>Disclosure of remaining performance obligations when the performance obligation is part of a contract that has an original expected duration of one year or less.</p> <p>References: ASC 606-10-50-15 ASC 606-10-50-14(a)</p>
	<p>Disclosure of remaining performance obligations when revenue is recognized from the satisfaction of the performance obligation in accordance with the "right to invoice" practical expedient.</p> <p>References: ASC 606-10-50-15 ASC 606-10-50-14(b) ASC 606-10-55-18</p>

Line Item(s)	Response
<p>Disclosure of information for variable consideration when the variable consideration is accounted for in accordance with the sales-based or usage-based royalty guidance.</p> <p>References: <u>ASC 606-10-50-15</u> <u>ASC 606-10-50-14A(a)</u>.</p>	
<p>Disclosure of information for variable consideration when the variable consideration is allocated entirely to a wholly unsatisfied performance obligation or to a wholly unsatisfied promise to transfer a distinct good or service that forms part of a series of distinct goods or services</p> <p>References: <u>ASC 606-10-50-15</u> <u>ASC 606-10-50-14A(b)</u>.</p>	
<p>Disclose the following for each optional exemption applied:</p> <p>References: <u>ASC 606-10-50-15</u></p>	
<p>The nature of the performance obligations.</p> <p>References: <u>ASC 606-10-50-15</u></p>	
<p>The remaining duration of the performance obligations.</p> <p>References: <u>ASC 606-10-50-15</u></p>	
<p>A description of the variable consideration (for example, the nature of the variability and how that variability will be resolved) that has been excluded from the information disclosed about remaining performance obligations.</p> <p>References: <u>ASC 606-10-50-15</u></p>	
<p>The information shall include sufficient detail to enable users of financial statements to understand the remaining performance obligations.</p> <p>References: <u>ASC 606-10-50-15</u></p>	
<p>Whether any consideration from contracts with customers is not included in the transaction price and, therefore, not included in the information disclosed about remaining performance obligations.</p> <p>References: <u>ASC 606-10-50-15</u></p>	

Line Item(s)	Response
	<p>For example an estimate of the transaction price would not include any estimated amounts of variable consideration that are constrained.</p> <p>References: ASC 606-10-50-15</p>
	<p>Disclose the judgments, and changes in the judgments, made in applying the guidance of Topic 606 that significantly affect the determination of the amount and timing of revenue from contracts with customers. In particular, explain the judgments, and changes in the judgments, used in determining both of the following:</p> <p>References: ASC 606-10-50-17</p>
	<p>The timing of satisfaction of performance obligations (see disclosure guidance section Determining the Timing of Satisfaction of Performance Obligations)</p> <p>References: ASC 606-10-50-17(a)</p>
	<p>The transaction price and the amounts allocated to performance obligations (see disclosure guidance section Determining the Transaction Price and the Amounts Allocated to Performance Obligations)</p> <p>References: ASC 606-10-50-17(b)</p>
	<p>Disclose both of the following for performance obligations satisfied over time:</p> <p>References: ASC 606-10-50-18</p>
	<p>The methods used to recognize revenue (for example a description of the output methods or input methods used and how those methods are applied)</p> <p>References: ASC 606-10-50-18(a)</p>
	<p>An explanation of why the methods used provide a faithful depiction of the transfer of goods or services.</p> <p>References: ASC 606-10-50-18(b)</p>
	<p>Disclose the significant judgments made in evaluating when a customer obtains control of promised goods or services for performance obligations satisfied at a point in time.</p> <p>References: ASC 606-10-50-19</p>

Line Item(s)	Response
<p>Disclose information about the methods, inputs, and assumptions used for all of the following:</p> <p>References: <u>ASC 606-10-50-20</u></p>	
<p>Determining the transaction price, which includes, but is not limited to, estimating variable consideration, adjusting the consideration for the effects of the time value of money, and measuring noncash consideration.</p> <p>References: <u>ASC 606-10-50-20(a)</u></p>	
<p>Assessing whether an estimate of variable consideration is constrained.</p> <p>References: <u>ASC 606-10-50-20(b)</u></p>	
<p>Allocating the transaction price, including estimating standalone selling prices of promised goods or services and allocating discounts and variable consideration to a specific part of the contract (if applicable)</p> <p>References: <u>ASC 606-10-50-20(c)</u></p>	
<p>Measuring obligations for returns, refunds, and other similar obligations.</p> <p>References: <u>ASC 606-10-50-20(d)</u></p>	
<p>Disclose the use of the practical expedient in reference to a significant financing component.</p> <p>References: <u>ASC 606-10-50-22</u></p>	
<p>Disclose the use of the practical expedient in reference to incremental costs of obtaining a contract.</p> <p>References: <u>ASC 606-10-50-22</u></p>	
<p>Disclose which method is used in adopting the guidance in Topic 606:</p> <p>References: <u>ASC 606-10-65-1(d)</u></p>	
<p>Retrospectively to each prior reporting period presented ("retrospective").</p> <p>References: <u>ASC 606-10-65-1(d)(1)</u></p>	

Line Item(s)	Response
	<p>Retrospectively with the cumulative effect of initially applying Topic 606 recognized at the date of initial application ("modified retrospective").</p> <p>References: <u>ASC 606-10-65-1(d)(2)</u>.</p>
	<p>The date of initial application is the start of the reporting period in which an entity first applies the guidance in Topic 606.</p> <p>References: <u>ASC 606-10-65-1(c)(1)</u>.</p>
	<p>A completed contract is a contract for which all (or substantially all) of the revenue was recognized in accordance with revenue guidance that is in effect before the date of initial application.</p> <p>References: <u>ASC 606-10-65-1(c)(2)</u>.</p>
	<p>If retrospective adoption is applied, disclose the following:</p>
	<p>Disclose all of the following in the fiscal period in which a change in accounting principle is made:</p> <p>References: <u>ASC 606-10-65-1(e)</u> <u>ASC 250-10-50-1</u></p>
	<p>The nature of and reason for the change in accounting principle, including an explanation of why the newly adopted accounting principle is preferable.</p> <p>References: <u>ASC 250-10-50-1(a)</u>.</p>
	<p>The method of applying the change, including all of the following:</p> <p>References: <u>ASC 250-10-50-1(b)</u>.</p>
	<p>A description of the prior-period information that has been retrospectively adjusted, if any.</p> <p>References: <u>ASC 250-10-50-1(b)(1)</u>.</p>

Line Item(s)	Response
	<p>The effect of the change on income from continuing operations, net income (or other appropriate captions of changes in the applicable net assets or performance indicator), any other affected financial statement line item, and any affected per-share amounts for any prior periods retrospectively adjusted. Presentation of the effect on financial statement subtotals and totals other than income from continuing operations and net income (or other appropriate captions of changes in the applicable net assets or performance indicator) is not required.</p> <p>References: <u>ASC 250-10-50-1(b)(2)</u>.</p>
	<p>The cumulative effect of the change on retained earnings or other components of equity or net assets in the statement of financial position as of the beginning of the earliest period presented.</p> <p>References: <u>ASC 250-10-50-1(b)(3)</u>.</p>
	<p>If retrospective application to all prior periods is impracticable, disclosure of the reasons therefore, and a description of the alternative method used to report the change.</p> <p>References: <u>ASC 250-10-50-1(b)(4)</u>.</p>
	<p>If indirect effects of a change in accounting principle are recognized, disclose both of the following:</p> <p>References: <u>ASC 250-10-50-1(c)</u></p>
	<p>A description of the indirect effects of a change in accounting principle, including the amounts that have been recognized in the current period, and the related per-share amounts, if applicable.</p> <p>References: <u>ASC 250-10-50-1(c)(1)</u>.</p>
	<p>Unless impracticable, the amount of the total recognized indirect effects of the accounting change and the related per-share amounts, if applicable, that are attributable to each prior period presented. Compliance with this disclosure requirement is practicable unless an entity cannot comply with it after making every reasonable effort to do so.</p> <p>References: <u>ASC 250-10-50-1(c)(2)</u>.</p>

Line Item(s)	Response
	<p>An entity that issues interim financial statements shall provide the required disclosures in the financial statements of both the interim period of the change and the annual period of the change.</p> <p>References: ASC 250-10-50-2</p>
	<p>In the fiscal year in which a new accounting principle is adopted, financial information reported for interim periods after the date of adoption shall disclose the effect of the change on income from continuing operations, net income (or other appropriate captions of changes in the applicable net assets or performance indicator), and related per-share amounts, if applicable, for those post-change interim periods.</p> <p>References: ASC 250-10-50-3</p>
	<p>Disclose the following in reference to practical expedients used in applying Topic 606 retrospectively:</p> <p>References: ASC 606-10-65-1(g)(1)</p>
	<p>For completed contracts, an entity need not restate contracts that begin and are completed within the same annual reporting period.</p> <p>References: ASC 606-10-65-1(f)(1)</p>
	<p>For completed contracts that have variable consideration, an entity may use the transaction price at the date the contract was completed rather than estimating variable consideration amounts in the comparative reporting periods.</p> <p>References: ASC 606-10-65-1(f)(2)</p>
	<p>For all reporting periods presented before the date of initial application, an entity need not disclose the amount of the transaction price allocated to the remaining performance obligations and an explanation of when the entity expects to recognize that amount as revenue.</p> <p>References: ASC 606-10-65-1(f)(3)</p>

Line Item(s)	Response
	<p>For contracts that were modified before the beginning of the earliest reporting period presented in accordance with Topic 606, an entity need not retrospectively restate the contract for those contract modifications. Instead, an entity shall reflect the aggregate effect of all modifications that occur before the beginning of the earliest period presented in accordance with Topic 606 when: (1) identifying the satisfied and unsatisfied performance obligations, (2) determining the transaction price, and (3) allocating the transaction price to the satisfied and unsatisfied performance obligations.</p> <p>References: <u>ASC 606-10-65-1(f)(4)</u>.</p>
	<p>The entity shall apply each practical expedient used consistently to all contracts within all reporting periods presented.</p> <p>References: <u>ASC 606-10-65-1(g)</u>.</p>
	<p>To the extent reasonably possible, a qualitative assessment of the estimated effect of applying each of those expedients.</p> <p>References: <u>ASC 606-10-65-1(g)(2)</u>.</p>
	<p>If modified retrospective adoption is applied, disclose the following:</p>
	<p>Disclose the nature of and reason for the change in accounting principle.</p> <p>References: <u>ASC 606-10-65-1(i)</u>.</p>
	<p>Disclose each of the following:</p> <p>References: <u>ASC 606-10-65-1(i)</u>.</p>
	<p>The amount by which each financial statement line item is affected in the current reporting period by the application of the guidance in Topic 606 as compared with the guidance that was in effect before the change.</p> <p>References: <u>ASC 606-10-65-1(i)(1)</u>.</p>
	<p>An explanation for the reasons for significant changes.</p> <p>References: <u>ASC 606-10-65-1(i)(2)</u>.</p>

Line Item(s)	Response
	<p>Disclose whether Topic 606 was applied to all contracts at the date of initial application or only to contracts that are not completed at the date of initial application.</p> <p>References: <u>ASC 606-10-65-1(h)</u></p>
	<p>Disclose the following in reference to the use of the practical expedient for contract modifications, if applicable:</p> <p>References: <u>ASC 606-10-65-1(g)</u></p>
	<p>The practical expedient for contract modifications is as follows: For contracts that were modified before the beginning of the earliest reporting period presented in accordance with Topic 606, an entity need not retrospectively restate the contract for those contract modifications. Instead, an entity shall reflect the aggregate effect of all modifications that occur before the beginning of the earliest period presented in accordance with Topic 606 when: (1) Identifying the satisfied and unsatisfied performance obligations. (2) Determining the transaction price. (3) Allocating the transaction price to the satisfied and unsatisfied performance obligations.</p> <p>References: <u>ASC 606-10-65-1(f)(4)</u></p>
	<p>That the practical expedient for contract modifications has been used.</p> <p>References: <u>ASC 606-10-65-1(g)(1)</u></p>
	<p>To the extent reasonably possible, a qualitative assessment of the estimated effect of applying each of those expedients.</p> <p>References: <u>ASC 606-10-65-1(g)(2)</u></p>
	<p>An entity shall provide the following disclosures of assets recognized from the costs to obtain or fulfill a contract with a customer in accordance with paragraphs 340-40-25-1 or 340-40-25-5:</p> <p>References: <u>ASC 340-40-50-1</u></p>
	<p>An entity shall describe both of the following:</p> <p>References: <u>ASC 340-40-50-2</u></p>

Line Item(s)	Response
	<p>The judgments made in determining the amount of the costs incurred to obtain or fulfill a contract with a customer (in accordance with paragraph 340-40-25-1 or 340-40-25-5)</p> <p>References: <u>ASC 340-40-50-2</u></p>
	<p>The method it uses to determine the amortization for each reporting period.</p> <p>References: <u>ASC 340-40-50-2</u></p>
	<p>An entity shall disclose all of the following:</p> <p>References: <u>ASC 340-40-50-3</u></p>
	<p>The closing balances of assets recognized from the costs incurred to obtain or fulfill a contract with a customer (in accordance with paragraph 340-40-25-1 or 340-40-25-5), by main category of asset (for example, costs to obtain contracts with customers, precontract costs, and setup costs)</p> <p>References: <u>ASC 340-40-50-3</u></p>
	<p>The amount of amortization and any impairment losses recognized in the reporting period</p> <p>References: <u>ASC 340-40-50-3</u></p>
	<p>If an entity elects to use the practical expedient in paragraph 340-40-25-4 on the incremental costs of obtaining a contract, the entity shall disclose that fact</p> <p>References: <u>ASC 340-40-50-5</u></p>
	<p>Franchisors</p>
	<p>If there are significant changes in franchisor-owned outlets or franchised outlets during the period, the number of the following shall be disclosed:</p> <p>References: <u>ASC 952-10-50-1</u></p>
	<p>Franchises sold</p> <p>References: <u>ASC 952-10-50-1</u></p>

Line Item(s)	Response
<p>Franchises purchased during the period</p> <p>References: ASC 952-10-50-1</p>	
<p>Franchised outlets in operation</p> <p>References: ASC 952-10-50-1</p>	
<p>Franchisor-owned outlets in operation.</p> <p>References: ASC 952-10-50-1</p>	
<p>Common Realty Interest Associations</p>	
<p>In addition to disclosures required by generally accepted accounting principles (GAAP) for other entities, the notes to a common interest realty association's financial statements shall also include disclosures about all of the following:</p> <p>References: ASC 972-235-50-1</p>	
<p>The common interest realty association's legal form (corporation or association) and that of the entity for which it provides services (for example, condominium, homeowners association, cooperative), areas it controls, and the number of units. (In place of the number of units, cooperative housing corporations may disclose the number of shares and time-share associations may disclose the number of weeks.)</p> <p>References: ASC 972-235-50-1</p>	
<p>Services (such as maintenance) and subsidies provided by the developer</p> <p>References: ASC 972-235-50-1</p>	
<p>The number of units (shares for cooperative housing corporations and weeks for time-share associations) owned by the developer</p> <p>References: ASC 972-235-50-1</p>	

Line Item(s)	Response
<p>The proposed use for funds collected in special assessments</p> <p>References: ASC 972-235-50-1</p>	
<p>Assessments that were used for purposes other than those for which they were designated.</p> <p>References: ASC 972-235-50-1</p>	
<p>Clarifying the Scope of Asset Derecognition Guidance and Accounting for Partial Sales of Nonfinancial Assets (ASU 2017-05)</p>	
<p>For entities that adopted ASU 2017-05 (ASC 610-20) in the current fiscal year, they shall make the same transition disclosure requirements as specified for ASU 2014-09 (ASC 606), under ASC 606-10-65-1. In addition, the entity shall disclose the following:</p>	
<p>If an entity elects to apply a different transition method to contracts with customers than to contracts with noncustomers, it shall disclose that election and provide the appropriate disclosures associated with each transition method. An entity also may elect to apply different practical expedients to contracts with customers than to contracts with noncustomers.</p> <p>References: ASC 606-10-65-1(j).</p>	
<p>Recognition and Measurement of Financial Assets and Financial Liabilities (ASU 2016-01)</p>	
<p>Certain disclosures were updated and are included in the "Investments in Debt and Equity Securities" disclosure requirements section above. In addition, for entities that adopted ASU 2016-01 in the current fiscal year, disclose the following:</p>	
<p>An entity shall apply prospectively the amendment that requires the exit price notion in Topic 820 on fair value measurement to be used to measure fair value of financial instruments for disclosure purposes. If because of measuring fair value of financial instruments in accordance with the guidance in Topic 820, the prior-year figures shown for comparative purposes will no longer be comparable, an entity shall make a disclosure to explain that fact. That disclosure is in conformity with the guidance in Subtopic 205-10 on presentation of financial statements that requires that any change in the manner of or basis for presenting corresponding items for two or more periods that affects comparability of financial statements shall be disclosed.</p> <p>References: ASC 825-10-65-2(f).</p>	

Line Item(s)	Response
<p>An entity shall disclose the following, consistent with Subtopic 250-10, in the period that the entity adopts the pending content that links to this paragraph:</p> <p>References: <u>ASC 825-10-65-2(g)</u></p>	
<p>The nature of and reason for the change in accounting principle, including an explanation of the newly adopted accounting principle.</p> <p>References: <u>ASC 825-10-65-2(g)</u></p>	
<p>The method of applying the change.</p> <p>References: <u>ASC 825-10-65-2(g)</u></p>	
<p>The effect of the adoption on any line item in the statement of financial position, if material, as of the beginning of the fiscal year for which the pending content that links to this paragraph is applied. Presentation of the effect on financial statement subtotals is not required.</p> <p>References: <u>ASC 825-10-65-2(g)</u></p>	
<p>The cumulative effect of the change on retained earnings or other components of equity in the statement of financial position as of the beginning of the fiscal year for which the pending content that links to this paragraph is applied.</p> <p>References: <u>ASC 825-10-65-2(g)</u></p>	
<p>An entity that issues interim financial statements shall provide the disclosures above in each interim financial statement of the fiscal year of change and the annual financial statement of the period of the change.</p> <p>References: <u>ASC 825-10-65-2(g)</u></p>	
<p>Technical Corrections to Recognition and Measurement of Financial Assets and Financial Liabilities (ASU 2018-03)</p>	
<p>For entities that adopted ASU 2018-03 in the current fiscal year, disclose the following in accordance with ASC 250:</p>	

Line Item(s)	Response
	<p>The effect of the adoption on any line item in the statement of financial position, if material, as of the beginning of the fiscal year for which the pending content that links to this paragraph is applied. Presentation of the effect on financial statement subtotals is not required.</p> <p>References: ASC 825-10-65-3(e)</p>
	<p>The cumulative effect of the change on retained earnings or other components of equity in the statement of financial position from the beginning of the fiscal year in which the pending content that links to this paragraph is applied to the adoption date of the pending content that links to this paragraph.</p> <p>References: ASC 825-10-65-3(e)</p>
Classification of Certain Cash Receipts and Cash Payments (ASU 2016-15)	
For entities that adopted ASU 2016-15 in the current fiscal year, present the following:	
	<p>This ASU addressed eight specific cash flow presentation issues. Please refer to the ASU for a description of the presentation requirements. Certain disclosures were also updated and are included in the cash flow disclosure requirements section above.</p>
	<p>If the indirect method is used, amounts of interest paid (net of amounts capitalized), including the portion of the payments made to settle zerocoupon debt instruments that is attributable to accreted interest related to the debt discount or the portion of the payments made to settle other debt instruments with coupon interest rates that are insignificant in relation to the effective interest rate of the borrowing that is attributable to accreted interest related to the debt discount, and income taxes paid during the period shall be disclosed.</p> <p>References: ASC 230-10-50-2</p>
	<p>An entity shall provide the disclosures in paragraphs 250-10-50-1(a) and (b)(1) and 250-10-50-2, as applicable, in the first interim and annual period the entity adopts the pending content that links to this paragraph. If retrospective application to any prior period is impracticable, an entity also shall provide the disclosures in paragraph 250-10-50-1(b)(4).</p> <p>References: ASC 230-10-65-2(f)</p>
Statement of Cash Flows - Restricted Cash (ASU 2016-18)	
For entities that adopted ASU 2016-18 in the current fiscal year, present the following:	

Line Item(s)	Response
	<p>A statement of cash flows shall explain the change during the period in the total of cash, cash equivalents, and amounts generally described as restricted cash or restricted cash equivalents. The statement shall use descriptive terms such as cash or cash and cash equivalents rather than ambiguous terms such as funds. When cash, cash equivalents, and amounts generally described as restricted cash or restricted cash equivalents are presented in more than one line item within the statement of financial position, an entity shall provide the disclosures required in paragraph 230-10-50-8.</p> <p>References: ASC 230-10-45-4</p>
	<p>Cash purchases and sales of items commonly considered to be cash equivalents generally are part of the entity's cash management activities rather than part of its operating, investing, and financing activities, and details of those transactions need not be reported in a statement of cash flows. In addition, transfers between cash, cash equivalents, and amounts generally described as restricted cash or restricted cash equivalents are not part of the entity's operating, investing, and financing activities, and details of those transfers are not reported as cash flow activities in the statement of cash flows.</p> <p>References: ASC 230-10-45-5</p>
	<p>A statement of cash flows for a period shall report net cash provided or used by operating, investing, and financing activities and the net effect of those flows on the total of cash, cash equivalents, and amounts generally described as restricted cash or restricted cash equivalents during the period. The statement of cash flows shall report that information in a manner that reconciles beginning and ending totals of cash, cash equivalents, and amounts generally described as restricted cash or restricted cash equivalents.</p> <p>References: ASC 230-10-45-24</p>
<p>For entities that adopted ASU 2016-18 in the current fiscal year, disclose the following:</p>	
	<p>Information about the nature of restrictions on its cash, cash equivalents, and amounts generally described as restricted cash or restricted cash equivalents.</p> <p>References: ASC 230-10-50-7</p>

Line Item(s)	Response
	<p>When cash, cash equivalents, and amounts generally described as restricted cash or restricted cash equivalents are presented in more than one line item within the statement of financial position, an entity shall, for each period that a statement of financial position is presented, present on the face of the statement of cash flows or disclose in the notes to the financial statements, the line items and amounts of cash, cash equivalents, and amounts generally described as restricted cash or restricted cash equivalents reported within the statement of financial position. The amounts, disaggregated by the line item in which they appear within the statement of financial position, shall sum to the total amount of cash, cash equivalents, and amounts generally described as restricted cash or restricted cash equivalents at the end of the corresponding period shown in the statement of cash flows. This disclosure may be provided in either a narrative or a tabular format.</p> <p>References: ASC 230-10-50-8</p>
	<p>An entity shall provide the disclosures in paragraphs 250-10-50-1(a) and (b)(1) and 250-10-50-2, as applicable, in the first interim and annual period the entity adopts the pending content that links to this paragraph.</p> <p>References: ASC 230-10-65-3(e)</p>
Recognition of Breakage for Certain Prepaid Stored-Value Products (2016-04)	
For entities that adopted ASU 2016-04 in the current fiscal year, disclose the following:	
	<p>If an entity recognizes a breakage amount in accordance with paragraph 405-20-40-4, disclose the methodology used to recognize breakage and significant judgments made in applying the breakage methodology.</p> <p>References: ASC 405-20-50-2</p>
	<p>An entity shall provide the disclosures required in paragraphs 250-10-50-1(a) and (b)(3) and 250-10-50-2, as applicable. If an entity elects to apply the standard retrospectively in accordance with 405-20-65-1(c) (1), the entity also shall provide the disclosure required by paragraph 250-10-50-1(b)(1).</p> <p>References: ASC 405-20-65-1(d)</p>
Intra-Entity Transfers of Assets Other Than Inventory (ASU 2016-16)	
For entities that adopted ASU 2016-16 in the current fiscal year, disclose the following:	

Line Item(s)	Response
<p>The nature of and reason for the change in accounting principle</p> <p>References: <u>ASC 740-10-65-5(d)</u></p>	
<p>The effect of the change on income from continuing operations, net income (or other appropriate captions of changes in the applicable net assets or performance indicator), any other affected financial statement line item(s), and any affected per-share amounts for the current period</p> <p>References: <u>ASC 740-10-65-5(d)</u></p>	
<p>The cumulative effect of the change on retained earnings or other components of equity or net assets in the statement of financial position as of the beginning of the period of adoption.</p> <p>References: <u>ASC 740-10-65-5(d)</u></p>	
<p>Improving the Presentation of Net Periodic Pension Cost and Net Periodic Postretirement Benefit Cost (ASU 2017-07)</p>	
<p>For entities that adopted ASU 2017-07 in the current fiscal year, disclose the following:</p>	
<p>An entity shall disclose the nature of and reason for the change in accounting principle in the first interim and annual periods in which the entity adopts the standard.</p> <p>References: <u>ASC 715-20-65-3(e)</u></p>	
<p>Service Concession Arrangements: Determining the Customer of the Operation Services (ASU 2017-10)</p>	
<p>For entities that adopted ASU 2017-10 in the current fiscal year, disclose the following:</p>	
<p>If an entity elects to apply the standard retrospectively in accordance with ASC 853-10-65-2 (e)(1), the entity shall provide the disclosures required in paragraphs 250-10-50-1 through 50-2 in the period of adoption, except as follows. An entity need not disclose the effect of the changes on the current period, which otherwise is required by paragraph 250-10-50-1(b)(2). However, an entity shall disclose the effect of the changes on any prior periods that have been retrospectively adjusted.</p> <p>References: <u>ASC 853-10-65-2</u></p>	

Line Item(s)	Response
	<p>An entity shall disclose whether it has applied the standard to all contracts at the date of initial application or only to contracts that are not completed contracts at the date of initial application.</p> <p>References: ASC 853-10-65-2</p>
	<p>For periods that include the date of initial application, an entity that applies the standard retrospectively in accordance with ASC 853-10-65-2(e)(2) shall disclose the nature of and reason for the change in accounting principle and provide both of the following disclosures:</p> <p>References: ASC 853-10-65-2</p>
	<p>The amount by which each financial statement line item is affected in the current period by the application of the pending content that links to this paragraph as compared with the guidance that was in effect before the change.</p> <p>References: ASC 853-10-65-2</p>
	<p>An explanation of the reasons for significant changes identified above.</p> <p>References: ASC 853-10-65-2</p>
	<p>Note: As noted above, the SEC staff has indicated that if a new accounting standard has been adopted in an interim period, all of the disclosures prescribed by the standard for annual financial statements should be included in the interim financial statements, in addition to any transitional disclosures required by the standard. The disclosures should be repeated in Form 10-Qs filed subsequent to the interim period of adoption until the next Form 10-K is filed. Accordingly, the following disclosure requirements relate to new accounting standard updates (ASUs) which are effective or early adoptable for fiscal years beginning after December 15, 2017.</p> <p>References: SEC Volume 3140.33</p>
	<p>Amendments to SEC Paragraphs Pursuant to SEC Staff Accounting Bulletin No. 118 (ASU 2018-05)</p>
	<p>In addition to the general disclosures under ASC 740, the following disclosures from SAB 118 relate only to the Tax Cuts and Jobs Act during the measurement period which should not exceed one year from the enactment date:</p> <p>References: ASC 740-10-S99-2A</p>

Line Item(s)	Response
<p>Qualitative disclosures of the income tax effects of the Act for which the accounting is incomplete;</p> <p>References: <u>ASC 740-10-S99-2A</u></p>	
<p>Disclosures of items reported as provisional amounts;</p> <p>References: <u>ASC 740-10-S99-2A</u></p>	
<p>Disclosures of existing current or deferred tax amounts for which the income tax effects of the Act have not been completed;</p> <p>References: <u>ASC 740-10-S99-2A</u></p>	
<p>The reason why the initial accounting is incomplete;</p> <p>References: <u>ASC 740-10-S99-2A</u></p>	
<p>The additional information that is needed to be obtained, prepared, or analyzed in order to complete the accounting requirements under ASC Topic 740;</p> <p>References: <u>ASC 740-10-S99-2A</u></p>	
<p>The nature and amount of any measurement period adjustments recognized during the reporting period;</p> <p>References: <u>ASC 740-10-S99-2A</u></p>	
<p>The effect of measurement period adjustments on the effective tax rate; and</p> <p>References: <u>ASC 740-10-S99-2A</u></p>	
<p>When the accounting for the income tax effects of the Act has been completed.</p> <p>References: <u>ASC 740-10-S99-2A</u></p>	
<p>Part I. Financial Information; Item 2. Management's Discussion and Analysis of Financial Condition and Results of Operations</p>	

Line Item(s)	Response
	<p>Form 10-Q requires the registrant to furnish the information required by Item 303 of Regulation S-K.</p> <p>References: <u>Form 10-Q</u></p>
	<p>Note: Registrants may presume that users of interim financial information have read or have access to MD&A for the preceding fiscal year.</p> <p>References: <u>S-K 303(b)(2)</u> <u>Form 10-Q</u></p>
	<p>Note: Certain wholly owned subsidiaries required to file Form 10-Q may omit certain information called for in MD&A, if certain conditions are met. Form 10-Q, general instruction G describes these requirements and the information that may be omitted.</p> <p>References: <u>Form 10-Q</u></p>
	<p>MD&A is required to focus only on material changes. If the interim financial statements reveal material changes from period to period in one or more significant line items, describe the causes for the changes if they have not already been disclosed; however, if the causes for a change in one line item also relate to other line items, no repetition is required. The amounts of changes from period to period that are readily computable from the numerical data contained in the financial statements should not be repeated.</p> <p>References: <u>S-K 303(b)(2)</u></p>
	<p>Note: In 2011 the Division of Corporation Finance began issuing a new form of guidance called "CF Disclosure Guidance Topics." These topics include disclosures related to cybersecurity risks, European sovereign debt exposures, and smaller financial institutions. CF Disclosure Guidance Topics can be found on the SEC's website at http://www.sec.gov/divisions/corpfin/cfdisclosure.shtml#cfguidancetopics.</p>
	<p>Note: In February 2018, the SEC issued additional interpretive guidance on disclosure of cybersecurity risks and incidents in companies' periodic filings. Refer to the interpretive guidance at: https://www.sec.gov/rules/interp/2018/33-10459.pdf</p>
<p>Discuss material changes in the following items from Regulation S-K 303(a)</p> <p>References: <u>S-K 303(b)</u></p>	

Line Item(s)	Response
	<p>Note: the impact of inflation and changing prices on interim periods presented may be omitted.</p> <p>References: <u>S-K 303(b)</u>.</p>
	<p>Liquidity</p> <p>References: <u>S-K 303(a)</u>.</p>
	<p>Capital Resources</p> <p>References: <u>S-K 303(a)</u>.</p>
	<p>Results of Operations</p> <p>References: <u>S-K 303(a)</u>.</p>
	<p>Off-Balance Sheet Arrangements</p> <p>References: <u>S-K 303(a)</u>.</p>
	<p>Contractual Obligations</p> <p>References: <u>S-K 303(a)</u>.</p>
	<p>Note: the registrants is not required to include the table for contractual obligations that is normally required for annual statements under S-K 303(a)(5). Instead, disclose material changes outside the ordinary course of the business in the specified contractual obligations during the interim period.</p> <p>References: <u>S-K 303(b)</u>.</p>
	<p>Disclose forward-looking (prospective) information relating to material events (e.g., acquisitions, dispositions, and settlements of lawsuits), trends, demands, commitments, or uncertainties that are both presently known to management and are reasonably likely to have material effects on the registrant's financial condition or results of operations, or that would cause reported financial information not to be necessarily indicative of future financial condition or operating results.</p>

Line Item(s)	Response
	<p>If material changes in critical accounting policies have occurred, registrants should update (in interim MD&A) the discussion of Critical Accounting Policies filed for the preceding annual period. An updated discussion might be warranted if a critical accounting policy is adopted, amended, or newly identified in an interim period or if there are material changes in the related judgments, uncertainties, or likelihood of materially different amounts under different conditions or under different assumptions that are reasonably plausible.</p> <p>References: <u>S-K 303(b)</u> <u>SEC Volume 3140.36</u></p>
	<p>These same updated disclosures should be repeated in all subsequent interim period MD&A filings until the next annual MD&A is fully updated to reflect the changes.</p> <p>References: <u>SEC Volume 3140.36</u></p>
<p>Material Changes in Financial Condition</p> <p>References: <u>S-K 303(b)(1)</u></p>	
	<p>Discuss any material changes in financial condition from the end of the preceding fiscal year to the date of the most recent interim balance sheet provided.</p> <p>References: <u>S-K 303(b)(1)</u></p>
	<p>If the interim financial statements include an interim balance sheet as of the corresponding interim date of the preceding fiscal year, discuss any material changes in financial condition from that date to the date of the most recent interim balance sheet presented.</p> <p>References: <u>S-K 303(b)</u></p>
	<p>Discuss any seasonal aspects of the business that have had a material impact on the financial condition.</p> <p>References: <u>S-K 303(b)(2)</u></p>
<p>Material Changes in Results of Operations</p> <p>References: <u>S-K 303(b)(2)</u></p>	

Line Item(s)	Response
	<p>Discuss any material changes in the registrant's results of operations for the most recent fiscal quarter and year-to-date period and the corresponding quarter and year-to-date period of the preceding fiscal year.</p> <p>References: <u>S-K 303(b)(2)</u></p>
	<p>If the registrant has elected to provide an income statement for the 12-month period ended as of the date of the most recent interim balance sheet provided, discuss the material changes with respect to that 12-month period and the 12-month period ended as of the corresponding interim balance sheet date of the preceding fiscal year.</p> <p>References: <u>S-K 303(b)</u>.</p>
	<p>Identify any significant elements of the registrant's income or loss from continuing operations that do not arise from or are not necessarily representative of the registrant's ongoing business.</p> <p>References: <u>S-K 303(b)</u>.</p>
	<p>Discuss any seasonal aspects of the business that have had a material impact on the results of operations.</p> <p>References: <u>S-K 303(b)(2)</u></p>
	<p>Restructuring Charges</p> <p>References: <u>SAB Topic 5.P</u></p>
	<p>With regard to restructuring charges, the following should be discussed in the MD&A:</p> <p>References: <u>SAB Topic 5.P.3 (q.3)</u>.</p>
	<p>The events and decisions which gave rise to the restructuring,</p> <p>References: <u>SAB Topic 5.P.3 (q.3)</u>.</p>
	<p>The nature of the charge,</p> <p>References: <u>SAB Topic 5.P.3 (q.3)</u>.</p>

Line Item(s)	Response
	<p>The expected impact of the restructuring on future results of operations, liquidity, and sources and uses of capital resources.</p> <p>References: SAB Topic 5.P.3 (q.3).</p>
	<p>Disclosure of the effects of unusual or infrequent items on income and earnings-per-share are beneficial to a reader's understanding of the financial statements and are, therefore, acceptable.</p> <p>References: SAB Topic 5.P.3 (q.3).</p>
	<p>Include the following in the MD&A regarding restructuring charges:</p> <p>References: SAB Topic 5.P.4</p>
	<p>Disclose the nature and amounts of the types of exit costs and other types of restructuring charges that appear quantitatively or qualitatively material. Losses related to asset impairments should be identified separately from charges based on estimates of future cash expenditures.</p> <p>References: SAB Topic 5.P.4</p>
	<p>Disclose material changes and activity in the liability balances of each significant type of exit cost and involuntary employee termination benefits (either as a result of expenditures or changes in/reversals of estimates or the fair value of the liability) that occurred subsequent to the initiation date.</p> <p>References: SAB Topic 5.P.4</p>
	<p>In the event a company recognized liabilities for exit costs and involuntary employee termination benefits relating to multiple exit plans, present separate information for each individual exit plan that has a material effect on the balance sheet, results of operations, or cash flows.</p> <p>References: SAB Topic 5.P.4</p>
	<p>Whether or not currently recognizable in the financial statements, material exit or involuntary termination costs that affect a known trend, demand, commitment, event, or uncertainty to management, should be disclosed in MD&A.</p> <p>References: SAB Topic 5.P.4</p>

Line Item(s)	Response
	<p>Registrants should identify the periods in which material cash outlays are anticipated and the expected source of their funding. Registrants should also discuss material revisions to exit plans, exit costs, or the timing of the plan's execution, including the nature and reasons for the revisions.</p> <p>References: <u>SAB Topic 5.P.4</u></p>
	<p>The expected effects on future earnings and cash flows resulting from the exit plan should be quantified and disclosed, along with the initial period in which those effects are expected to be realized. This includes whether the cost savings are expected to be offset by anticipated increases in other expenses or reduced revenues. This discussion should clearly identify the income statement line items to be impacted.</p> <p>References: <u>SAB Topic 5.P.4</u></p>
	<p>In later periods, if actual savings anticipated by the exit plan are not achieved as expected or are achieved in periods other than as expected, MD&A should discuss that outcome, its reasons, and its likely effects on future operating results and liquidity.</p> <p>References: <u>ASC 420-10-50-1(b)</u></p>
	<p>For each major type of cost associated with the activity (for example, one-time employee termination benefits, contract termination costs, and other associated costs), both of the following shall be disclosed:</p> <p>References: <u>ASC 420-10-50-1(b)</u></p>
	<p>The total amount expected to be incurred in connection with the activity, the amount incurred in the period, and the cumulative amount incurred to date</p> <p>References: <u>ASC 420-10-50-1(b)(1)</u></p>
	<p>A reconciliation of the beginning and ending liability balances showing separately the changes during the period attributable to costs incurred and charged to expense, costs paid or otherwise settled, and any adjustments to the liability with an explanation of the reason(s) why.</p> <p>References: <u>ASC 420-10-50-1(b)(2)</u></p>
	<p>The line item(s) in the income statement or the statement of activities in which the costs in (b) are aggregated</p> <p>References: <u>ASC 420-10-50-1(c)</u></p>

Line Item(s)	Response
<p>For each reportable segment, as defined in Subtopic 280-10, the total amount of costs expected to be incurred in connection with the activity, the amount incurred in the period, and the cumulative amount incurred to date, net of any adjustments to the liability with an explanation of the reason(s) why</p> <p>References: ASC 420-10-50-1(d)</p>	
<p>If a liability for a cost associated with the activity is not recognized because fair value cannot be reasonably estimated, that fact and the reasons why.</p> <p>References: ASC 420-10-50-1(e)</p>	
<p>Recently Issued Accounting Standards</p> <p>References: SAB Topic 11.M</p>	
<p>Consider the following disclosures in both MD&A and footnotes to the financial statements about the impact that recently issued accounting standards will have on the financial position and results of operations when such standards are adopted by the registrant in a future period:</p> <p>References: SAB Topic 11.M</p>	
<p>A brief description of the new standard, the date that adoption is required, and the date that the registrant plans to adopt, if earlier.</p> <p>References: SAB Topic 11.M</p>	
<p>A discussion of the methods of adoption allowed by the standard and the method expected to be utilized by the registrant, if determined.</p> <p>References: SAB Topic 11.M</p>	
<p>A discussion of the impact that adoption of the standard is expected to have on the financial statements of the registrant. If the impact is expected to be immaterial or is not known or reasonably estimable, a statement to that effect may be made.</p> <p>References: SAB Topic 11.M</p>	

Line Item(s)	Response
<p>Disclosure of the potential impact of other significant matters that the registrant believes might result from the adoption of the standard (such as technical violations of debt covenant agreements, planned or intended changes in business practices, changes to postretirement benefit plan provisions prior to adoption, etc.) is encouraged.</p>	
<p>Consider providing disclosure for the expected impact of the following recently issued accounting standards:</p>	
<p>ASU 2014-09, Revenue from Contracts with Customers (Topic 606), and related updates, including: ASU 2016-08, Revenue from Contracts with Customers (Topic 606): Principal versus Agent Considerations (Reporting Revenue Gross versus Net); ASU 2016-10, Revenue from Contracts with Customers (Topic 606): Identifying Performance Obligations and Licensing; ASU 2016-12, Revenue from Contracts with Customers (Topic 606): Narrow-Scope Improvements and Practical Expedients.</p>	
<p>ASU 2016-01, Financial Instruments—Overall (Subtopic 825-10): Recognition and Measurement of Financial Assets and Financial Liabilities</p>	
<p>ASU 2016-04, Liabilities—Extinguishments of Liabilities (Subtopic 405-20): Recognition of Breakage for Certain Prepaid Stored-Value Products (a consensus of the FASB Emerging Issues Task Force)</p>	
<p>ASU 2016-13, Financial Instruments - Credit Losses (Topic 326): Measurement of Credit Losses on Financial Instruments</p>	
<p>ASU 2016-15, Statement of Cash Flows (Topic 230): Classification of Certain Cash Receipts and Cash Payments</p>	
<p>ASU 2016-16, Income Taxes (Topic 740): Intra-Entity Transfers of Assets Other Than Inventory</p>	
<p>ASU 2016-18, Statement of Cash Flows (Topic 230): Restricted Cash (a consensus of the FASB Emerging Issues Task Force)</p>	
<p>ASU 2017-01, Business Combinations (Topic 805): Clarifying the Definition of a Business</p>	
<p>ASU 2017-04, Intangibles - Goodwill and Other (Topic 350)</p>	
<p>ASU 2017-05, Other Income—Gains and Losses from the Derecognition of Nonfinancial Assets (Subtopic 610-20): Clarifying the Scope of Asset Derecognition Guidance and Accounting for Partial Sales of Nonfinancial Assets</p>	

Line Item(s)	Response
ASU 2017-07, Compensation—Retirement Benefits (Topic 715): Improving the Presentation of Net Periodic Pension Cost and Net Periodic Postretirement Benefit Cost	
ASU 2017-08, Receivables - Nonrefundable Fees and Other Costs (Subtopic 310-20): Premium Amortization on Purchased Callable Debt Securities	
ASU 2017-09, Compensation—Stock Compensation (Topic 718): Scope of Modification Accounting	
ASU 2017-10, Service Concession Arrangements (Topic 853): Determining the Customer of the Operation Services (a consensus of the FASB Emerging Issues Task Force)	
ASU 2017-11, Earnings Per Share (Topic 260) Distinguishing Liabilities from Equity (Topic 480) Derivatives and Hedging (Topic 815): I. Accounting for Certain Financial Instruments with Down Round Features, II. Replacement of the Indefinite Deferral for Mandatorily Redeemable Financial Instruments of Certain Nonpublic Entities and Certain Mandatorily Redeemable Noncontrolling Interests with a Scope Exception.	
ASU 2017-12, Derivatives and Hedging (Topic 815): Targeted Improvements to Accounting for Hedging Activities	
ASU 2017-15, Codification Improvements to Topic 995, U.S. Steamship Entities: Elimination of Topic 995	
ASU 2016-02, Leases (Topic 842)	
ASU 2018-01, Leases (Topic 842): Land Easement Practical Expedient for Transition to Topic 842	
ASU 2018-02, Income Statement—Reporting Comprehensive Income (Topic 220): Reclassification of Certain Tax Effects from Accumulated Other Comprehensive Income	
ASU 2018-03, Technical Corrections and Improvements to Financial Instruments - Overall (Subtopic 825-10): Recognition and Measurement of Financial Assets and Financial Liabilities	
ASU 2018-04, Amendments to SEC paragraphs pursuant to SEC Staff Accounting Bulletin No. 117 and SEC release No. 33-9273	
ASU 2018-05, Amendments to SEC paragraphs pursuant to SEC Staff Accounting Bulletin No. 118	
ASU 2018-06, Codification Improvements to Topic 942, Financial Services—Depository and Lending	

Line Item(s)	Response
ASU 2018-07, Compensation - Stock Compensation (Topic 718): Improvements to Nonemployee Share-Based Payment Accounting	
ASU 2018-08, Not-For-Profit Entities (Topic 958): Clarifying the Scope and the Accounting Guidance for Contributions Received and Contributions Made	
ASU 2018-09, Codification Improvements	
ASU 2018-10, Codification Improvements to Topic 842, Leases	
<p>With respect to ASU 2014-09, Revenue from Contracts with Customers (Topic 606); ASU 2016-02, Leases (Topic 842); and ASU 2016-13, Financial Instruments—Credit Losses (Topic 326): Measurement of Credit Losses on Financial Instruments, disclose the following:</p> <p>References: ASC 250-10-S99-6</p>	
	<p>SAB Topic 11.M provides the SEC staff view that a registrant should evaluate ASUs that have not yet been adopted to determine the appropriate financial statement disclosures about the potential material effects of those ASUs on the financial statements when adopted. Consistent with Topic 11.M, if a registrant does not know or cannot reasonably estimate the impact that adoption of the ASUs referenced in this announcement is expected to have on the financial statements, then in addition to making a statement to that effect, that registrant should consider additional qualitative financial statement disclosures to assist the reader in assessing the significance of the impact that the standard will have on the financial statements of the registrant when adopted. In this regard, the SEC staff expects the additional qualitative disclosures to include a description of the effect of the accounting policies that the registrant expects to apply, if determined, and a comparison to the registrant's current accounting policies. Also, a registrant should describe the status of its process to implement the new standards and the significant implementation matters yet to be addressed.</p>
	<p>Note: This also applies to any subsequent amendments to guidance in the ASUs that are issued prior to a registrant's adoption of the aforementioned ASUs.</p>
	<p>Note: Topic 11.M provides SEC staff views on disclosures that registrants should consider in both Management's Discussion & Analysis (MD&A) and the notes to the financial statements. MD&A may contain cross references to these disclosures that appear within the notes to the financial statements.</p>
<p>If any of the above accounting standard updates were early adopted in the current fiscal year, all of the disclosures prescribed by the standard for annual financial statements should be included in the interim financial statements, in addition to any transitional disclosures required by the standard.</p>	

Line Item(s)	Response
<p>Non-GAAP Financial Measures</p> <p>References: <u>S-K 10(e)</u>.</p>	
<p>Note: The SEC issued a Compliance and Disclosure Interpretation on May 18, 2016, which provides interpretations surrounding various Non-GAAP topics including prominence of GAAP and non-GAAP measures, recurring and non-recurring adjustments, presentation of tax impacts, and disclosures surrounding why the non-GAAP measure is useful to investors. Registrants should review these interpretations when preparing their quarterly reports.</p> <p>References: <u>S-K 10(e)</u>.</p>	
<p>Whenever one or more non-GAAP financial measures are included, include the following:</p> <p>References: <u>S-K 10(e)</u>.</p>	
<p>A presentation, with equal or greater prominence, of the most directly comparable financial measure calculated and presented in accordance with GAAP.</p> <p>References: <u>S-K 10(e)</u>.</p>	
<p>A reconciliation (by schedule or other clearly understandable method), which shall be quantitative for historical measures and quantitative, to the extent available without unreasonable efforts, for forward looking information, of the differences between the non-GAAP financial measure presented and the most directly comparable financial measure or measures calculated and presented in accordance with GAAP.</p> <p>References: <u>S-K 10(e)</u>.</p>	
<p>A statement why the registrant believes the presentation of the non-GAAP financial measure provides useful information to investors regarding the financial condition and operating results of the registrant. (Note: not required if this information was included in its most recent annual report or a more recent filing)</p> <p>References: <u>S-K 10(e)</u>.</p>	
<p>If material and not otherwise stated, include a statement detailing the additional uses of the non-GAAP financial measurement by the registrant's management. (Note: not required if this information was included in its most recent annual report or a more recent filing)</p> <p>References: <u>S-K 10(e)</u>.</p>	

Line Item(s)	Response
<p>Item 10(e) of Regulation S-K prohibits the following:</p> <p>References: <u>S-K 10(e)</u></p>	
<p>Excluding from non-GAAP liquidity measures, other than EBIT and EBITDA, charges or liabilities that required, or will require, cash settlement, or would have required cash settlement absent an ability to settle in another manner.</p> <p>References: <u>S-K 10(e)</u></p>	
<p>Adjusting a non-GAAP performance measure to eliminate or smooth items identified as non-recurring, infrequent, or unusual, when (1) the nature of the charge or gain is such that it is reasonably likely to recur within two years, or (2) there was a similar charge or gain within the prior two years.</p> <p>References: <u>S-K 10(e)</u></p>	
<p>Presenting non-GAAP financial measures on the face of the registrant's financial statements prepared in accordance with GAAP or in the accompanying notes.</p> <p>References: <u>S-K 10(e)</u></p>	
<p>Presenting non-GAAP financial measures on the face of any pro forma financial information required to be disclosed by Article 11 of Regulation S-X.</p> <p>References: <u>S-K 10(e)</u></p>	
<p>Using titles or descriptions of non-GAAP financial measures that are the same as, or confusingly similar to, titles or descriptions used for GAAP financial measures.</p> <p>References: <u>S-K 10(e)</u></p> <p><u>Form 10-Q</u></p>	
<p>Part I. Financial Information; Item 3. Quantitative and Qualitative Disclosures about Market Risk</p>	
<p>Furnish the information required by S-K 305.</p> <p>References: <u>Form 10-Q</u></p>	

Line Item(s)	Response
	<p>Interim quantitative disclosures about market risk must enable the reader to assess the sources and effects of material changes in market risk exposures that affect the quantitative and qualitative disclosures presented from the end of the preceding fiscal year to the date of the most recent balance sheet date.</p> <p>References: <u>S-K 305(c)</u></p>
Part I. Financial Information; Item 4. Controls and Procedures	
	<p>Furnish the information required by Items 307 and 308(c) of Regulation S-K:</p> <p>References: <u>Form 10-Q</u></p>
	<p>Disclose the conclusions of the registrant's principal executive officer or officers and principal financial officer or officers, or persons performing similar functions, regarding the effectiveness of the registrant's disclosure controls and procedures as of the end of the period covered by the report, based on the evaluation of these controls and procedures.</p> <p>References: <u>S-K 307</u></p>
	<p>Disclose any change in the registrant's internal control over financial reporting identified in connection with the evaluation that occurred during the registrant's last fiscal quarter (the registrant's fourth fiscal quarter in the case of an annual report) that has materially affected, or is reasonably likely to materially affect, the registrant's internal control over financial reporting.</p> <p>References: <u>S-K 308(c)</u> <u>Form 10-Q</u></p>
Part II. Other Information	
	<p>Note: Form 10-Q is required to contain the Item numbers and captions of all applicable Items of Part II, but the text of such Items may be omitted, provided the responses clearly indicate the coverage of the Item. Any Item that is inapplicable or to which the answer is negative may be omitted and no reference thereto need be made in Form 10-Q. If substantially the same information has been previously reported by the registrant (e.g., in Form 10-K or 8-K), disclosure of the information in Form 10-Q need not be made. A separate response need not be presented in Part II if the information called for is already disclosed in the financial information provided in Part I and is incorporated by reference into Part II by means of a statement to that effect.</p> <p>References: <u>Form 10-Q</u></p>

Line Item(s)	Response
<p>Part II. Other Information; Item 1. Legal Proceedings</p> <p>References: Form 10-Q</p>	
<p>Furnish the information required by Item 103 of Regulation S-K:</p> <p>References: Form 10-Q</p>	
<p>Describe briefly any material pending legal proceedings, other than ordinary routine litigation incidental to the business, to which the registrant or any of its subsidiaries is a party or of which any of their property is the subject. Include the name of the court or agency in which the proceedings are pending, the date instituted, the principal parties thereto, a description of the factual basis alleged to underlie the proceeding and the relief sought. Include similar information as to any such proceedings known to be contemplated by government authorities.</p> <p>References: S-K 103</p>	
<p>For any legal proceeding that was terminated during the period covered by Form 10-Q, furnish information similar to that required by Item 103 of Regulation S-K, including the date of termination and a description of the disposition.</p> <p>References: Form 10-Q</p>	
<p>Part II. Other Information; Item 1A. Risk Factors</p> <p>References: Form 10-Q</p>	
<p>Set forth any material changes from risk factors as previously disclosed in Item 1A of the last Form 10-K.</p> <p>References: Form 10-Q</p>	
<p>Note: In 2011, the Division of Corporation Finance began issuing a new form of guidance called "CF Disclosure Guidance Topics." These topics include disclosures related to cybersecurity risks, European sovereign debt exposures, and smaller financial institutions.</p> <p>References: Form 10-Q</p>	
<p>Part II. Other Information; Item 2. Unregistered Sales of Equity Securities and Use of Proceeds</p> <p>References: Form 10-Q</p>	

Line Item(s)	Response
<p>Furnish the following information as to all securities of the registrant sold by the registrant during the period covered by the Form 10-Q that were not registered under the Securities Act. If the information previously has been included in a Current Report on Form 8-K, it need not be furnished.</p> <p>References: <u>Form 10-Q</u></p>	
<p>Give the date of sale and the title and amount of securities sold.</p> <p>References: <u>S-K 703</u></p>	
<p>Give the names of the principal underwriters, if any.</p> <p>References: <u>S-K 703</u></p>	
<p>As to any such securities not publicly offered, name the persons or identify the class of persons to whom the securities were sold.</p> <p>References: <u>S-K 703</u></p>	
<p>Consideration received:</p> <p>References: <u>S-K 703</u></p>	
<p>As to securities sold for cash, state the aggregate offering price and the aggregate underwriting discounts or commissions.</p> <p>References: <u>S-K 703</u></p>	
<p>As to any securities sold otherwise than for cash, state the nature of the transaction and the nature and aggregate amount of consideration received by the registrant.</p> <p>References: <u>S-K 703</u></p>	
<p>Indicate the section of the Securities Act or the rule of the Commission under which exemption from registration was claimed and state briefly the facts relied upon to make the exemption available.</p> <p>References: <u>S-K 703</u></p>	

Line Item(s)	Response
<p>Where the securities sold by the registrant are convertible or exchangeable into equity securities, or are warrants or options representing equity securities, disclose the terms of conversion or exercise of the securities.</p> <p>References: S-K 703</p>	
<p>Use of proceeds.</p> <p>References: S-K 703</p>	
<p>If applicable, furnish the information required by Item 701(f) of Regulation S-K.</p> <p>References: Form 10-Q</p>	
<p>Furnish the information required by Item 703 of Regulation S-K for any purchase made by the issuer and affiliated purchasers in the quarter covered by the report on Form 10-Q.</p> <p>References: Form 10-Q</p>	
<p>Part II. Other Information; Item 3. Defaults Upon Senior Securities</p> <p>References: Form 10-Q</p>	
<p>If there has been any material default in the payment of principal, interest, a sinking or purchase fund installment, or any other material default not cured within 30 days, with respect to any indebtedness of the registrant or any of its significant subsidiaries exceeding 5 percent of the total assets of the registrant and its consolidated subsidiaries:</p> <p>References: Form 10-Q</p>	
<p>Identify the indebtedness.</p> <p>References: Form 10-Q</p>	
<p>State the nature of the default.</p> <p>References: Form 10-Q</p>	

Line Item(s)	Response
<p>In the case of such a default in the payment of principal, interest, or a sinking or purchase fund installment:</p> <p>References: Form 10-Q</p>	
<p>State the amount of the default.</p> <p>References: Form 10-Q</p>	
<p>The total arrearage on the date of filing this report.</p> <p>References: Form 10-Q</p>	
<p>If any material arrearage in the payment of dividends has occurred or if there has been any other material delinquency not cured within 30 days, with respect to any class of preferred stock of the registrant which is registered or which ranks prior to any class of registered securities, or with respect to any class of preferred stock of any significant subsidiary of the registrant:</p> <p>References: Form 10-Q</p>	
<p>Give the title of the class.</p> <p>References: Form 10-Q</p>	
<p>State the nature of the arrearage or delinquency.</p> <p>References: Form 10-Q</p>	
<p>In the case of an arrearage in the payment of dividends:</p> <p>References: Form 10-Q</p>	
<p>State the amount.</p> <p>References: Form 10-Q</p>	
<p>State the total arrearage on the date of filing this report.</p> <p>References: Form 10-Q</p>	

Line Item(s)	Response
<p>Part II. Other Information; Item 4. Mine Safety Disclosures</p> <p>References: <u>Form 10-Q</u></p>	
<p>If applicable, provide a statement that the information concerning mine safety violations or other regulatory matters required by Section 1503(a) of the Dodd-Frank Wall Street Reform and Consumer Protection Act and Item 104 of Regulation S-K is included in exhibit 95 to the quarterly report.</p> <p>References: <u>Form 10-Q</u></p>	
<p>Part II. Other Information; Item 5. Other Information</p> <p>References: <u>Form 10-Q</u></p>	
<p>The registrant must disclose under this item any information required to be disclosed in a report on Form 8-K during the period covered by this Form 10-Q, but not reported, whether or not otherwise required by this Form 10-Q.</p> <p>References: <u>Form 10-Q</u></p>	
<p>Note: If disclosure of such information is made under this Item, it need not be repeated on Form 8-K (which would otherwise be required to be filed for such information) or in a subsequent Form 10-Q.</p> <p>References: <u>Form 10-Q</u></p>	
<p>Describe any material changes to the procedures by which security holders may recommend nominees to the registrant's board of directors, where those changes were implemented after the registrant last provided disclosure in response to the requirements of Item 407(c)(3).</p> <p>References: <u>S-K 407(c)(3)</u>.</p>	
<p>Part II. Other Information; Item 6. Exhibits</p> <p>References: <u>Form 10-Q</u></p>	
<p>Furnish the exhibits required by Item 601 of Regulation S-K, as applicable.</p> <p>References: <u>Form 10-Q</u></p>	

Line Item(s)	Response
<p>Certifications</p> <p>References: <u>SOX 302</u></p>	
<p>Each report on Form 10-Q, other than a report filed by an Asset-Backed Issuer, must include a certification to be filed as an exhibit. Each principal executive officer or officers and principal financial officer or officers of the issuer, or person performing similar functions at the time of the filing of the report, must sign the certification.</p> <p>References: <u>SOX 302</u></p>	
<p>The certification included in each report must be in the form specified and consist of a statement of the certifying officer that:</p> <p>References: <u>SOX 302</u></p>	
<p>He/she has reviewed the report being filed.</p> <p>References: <u>SOX 302</u></p>	
<p>Based on his/her knowledge, the report does not contain any untrue statement of a material fact or omit to state a material fact necessary in order to make the statements made, in light of the circumstances under which such statements were made, not misleading with respect to the period covered by the report.</p> <p>References: <u>SOX 302</u></p>	
<p>Based on his/her knowledge, the financial statements and other financial information included in the report, fairly present in all material respects the financial condition, results of operations and cash flows of the registrant as of, and for, the periods presented in the report.</p> <p>References: <u>SOX 302</u></p>	
<p>He/she and the other certifying officers are responsible for establishing and maintaining disclosure controls and procedures and internal control over financial reporting for the registrant and have:</p> <p>References: <u>SOX 302</u></p>	

Line Item(s)	Response
	<p>Designed such disclosure controls procedures or caused such disclosure controls and procedures to be designed under his/her supervision, to ensure that material information relating to the issuer, including its consolidated subsidiaries, is made known to them by others within those entities, particularly during the period in which this report is being prepared.</p> <p>References: SOX 302</p>
	<p>Designed such internal control over financial reporting, or caused such internal control over financial reporting to be designed under his/her supervision, to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles.</p> <p>References: SOX 302</p>
	<p>Evaluated the effectiveness of the registrant's disclosure controls and procedures and presented in this report his/her conclusions about the effectiveness of the disclosure controls and procedures, as of the end of the period covered by this report based on such evaluation.</p> <p>References: SOX 302</p>
	<p>Disclosed in this report any change in the registrant's internal control over financial reporting that occurred during the registrant's most recent fiscal quarter (the registrant's fourth fiscal quarter in the case of an annual report) that has materially affected, or is reasonably likely to affect, the registrant's internal control over financial reporting.</p> <p>References: SOX 302</p>
	<p>He/she and the other certifying officers have disclosed, based on their most recent evaluation of internal control over financial reporting, to the issuer's auditors and to the audit committee of the board of directors (or persons fulfilling the equivalent function):</p> <p>References: SOX 302</p>
	<p>All significant deficiencies and material weaknesses in the design or operation of internal control over financial reporting which are reasonably likely to adversely affect the registrant's ability to record, process, summarize, and report financial information.</p> <p>References: SOX 302</p>

Line Item(s)	Response
<p>Any fraud, whether or not material, that involves management or other employees who have a significant role in the issuer's internal control over financial reporting.</p> <p>References: <u>SOX 302</u></p>	
<p>Note: The certification may be temporarily modified to eliminate certain references to internal control over financial reporting until the compliance date.</p> <p>References: <u>SEC Volume 3126.21</u></p>	