



Tel: 312-856-9100
Fax: 312-856-1379
www.bdo.com

330 North Wabash, Suite 3200
Chicago, IL 60611

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Via email to director@fasb.org

Ms. Hillary Salo, Technical Director
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, Connecticut 06856-5116

Re: Reference Rate Reform (Topic 848) and Derivatives and Hedging (Topic 815): Deferral of the Sunset Date of Topic 848 and Amendments to the Definition of the Secured Overnight Financing Rate (SOFR) Overnight Index Swap Rate (File Reference No. 2022-001)

Dear Ms. Salo:

We support the Board's proposed deferral of the sunset date of Topic 848. The proposed deferral aligns with current expectations on the cessation date of the major tenors of London Interbank Offered Rate (LIBOR). We also support the amendments to the definition of the Secured Overnight Financing Rate (SOFR) Overnight Index Swap Rate. We believe that such amendments reflect the Board's efforts to monitor the market for additional benchmark interest rates based on SOFR.

Please direct questions to Tim Kviz at (703) 245-8685 or Adam Brown at (214) 665-0673.

Very truly yours,

BDO USA, LLP

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