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ACCOUNTING STANDARDS UPDATE

No. 2009-07
September 2009

Accounting for Various Topics

Technical Corrections to SEC Paragraphs

An Amendment of the *FASB Accounting Standards Codification*[™]

Financial Accounting Standards Board
of the Financial Accounting Foundation

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Securities and Exchange Commission (SEC) Content

Accounting for Various Topics

Technical Corrections to SEC Paragraphs

This Codification Update represents technical corrections to various Topics containing SEC guidance based on external comments received.

1. Based on comments received, amend and subordinate paragraph 942-210-S99-1(12)(a) to 942-210-S99-1(12), with no link to transition, as follows:

12. Deposits. Disclose separately the amounts of noninterest bearing deposits and interest bearing deposits.

- (a) The amount of noninterest bearing deposits and interest bearing deposits in foreign banking offices must be presented if the disclosure provided by ~~§ 210.0-05~~ paragraph 942-235-S99-1 are required.

2. Based on comments received, amend paragraph 330-10-S35-2, with no link to transition, as follows:

See paragraph 420-10-S99-~~43~~, SEC Observer Comment: Classification of Inventory Markdowns and Other Costs Associated with Restructuring, for SEC Staff views on income statement classification of inventory markdowns associated with a restructuring.

3. Based on comments received, amend by removing the last sentence from paragraph 225-10-S99-7 and placing as the first sentence in paragraph 225-10-S99-8, with no link to transition, as follows:

S99-7 The following is the text of SAB Topic 11.A, Operating-Differential Subsidies.

Facts: Company A has received an operating-differential subsidy pursuant to the Merchant Marine Act of 1936, as amended.

Question: How should such subsidies be displayed in the income statement?

Interpretive Response: Revenue representing an operating-differential subsidy under the Merchant Marine Act of 1936, as amended, must be set forth as a separate line item in the income statement either under a revenue caption or as credit in the costs and expenses section.

~~Facts: Company B excludes depreciation and depletion from cost of sales in its income statement.~~

> > > SAB Topic 11.B, Depreciation and Depletion Excluded from Cost of Sales

S99-8 The following is the text of SAB Topic 11.B, Depreciation ~~A~~and Depletion Excluded ~~F~~from Cost of Sales.

Facts: Company B excludes depreciation and depletion from cost of sales in its income statement.

Question: How should this exclusion be disclosed?

Interpretive Response: If cost of sales or operating expenses exclude charges for depreciation, depletion and amortization of property, plant and equipment, the description of the line item should read somewhat as follows: "Cost of goods sold (exclusive of items shown separately below)" or "Cost of goods sold (exclusive of depreciation shown separately below)." To avoid placing undue emphasis on "cash flow," depreciation, depletion and amortization should not be positioned in the income statement in a manner which results in reporting a figure for income before depreciation.

4. Based on comments received, amend paragraph 605-10-S99-1, Question 2, Response 1(c), with no link to transition, as follows:

(c) the buyer's obligation to the seller would be changed (e. g., the seller would forgive the obligation or grant a refund) in the event of theft or physical destruction or damage of the product, FN11 ~~Statement 49, paragraph 6(e)~~.

5. Based on comments received, amend FN 14 in paragraph 605-10-S99-1 and subordinate to align at the same level as FN 15 if possible to do, with no link to transition, as follows:

FN14 Statement 49, paragraph 5(a). Paragraph 5(a) [paragraph 470-40-15-2(a)] provides examples of circumstances that meet this requirement. As discussed further therein, this condition is present if (a) a resale price guarantee exists, (b) the seller has an option to purchase the product, the economic effect of which compels the seller to purchase the product, or (c) the buyer has an option whereby it can require the seller to purchase the product.

6. Based on comments received, amend FN 35 in paragraph 605-10-S99-1, with no link to transition, as follows:

FN35 SOP 00-2, paragraph 7 [paragraph 926-605-25-1] ~~Concepts Statement 5, paragraph 83(a) and Statement 48, paragraph 6(b) [paragraph 605-15-25-1(b)].~~

7. Based on comments received, amend 605-15-S99-1 as follows:

S99-1 The following is the text of Interpretive Release No. 33-8642: Commission Guidance Regarding Accounting for Sales of Vaccines and Bioterror Countermeasures to the Federal Government for Placement into the Pediatric Vaccine Stockpile or the Strategic National Stockpile.

AGENCY: Securities and Exchange Commission.

ACTION: Interpretation.

SUMMARY: The Securities and Exchange Commission (Commission) is publishing this interpretive release with respect to accounting for sales of vaccines and bioterror countermeasures to the Federal government for placement into stockpiles related to the Vaccines for Children Program or the Strategic National Stockpile.

EFFECTIVE DATE: December 5, 2005.

FOR FURTHER INFORMATION CONTACT: Shelly C. Luisi, Senior Associate Chief Accountant or G. Anthony Lopez, Associate Chief Accountant, both of the Office of the Chief Accountant, at (202) 551-5300, oca@sec.gov, U.S. Securities and Exchange Commission, 100 F Street, NE, Washington, DC 20549-6561.

SUPPLEMENTARY INFORMATION: [author-generated text]

I. Introduction [author-generated text]

The Commission is committed to addressing any unintended consequences of accounting requirements that could impair the nation's ability to create and maintain sufficient supplies of various vaccines and bioterror countermeasures (vaccines). The Commission is aware that questions have been raised about the timing of the vaccine

manufacturers' revenue recognition for vaccines placed into stockpiles related to the Vaccines for Children Program and the Strategic National Stockpile. Additionally, concerns have been expressed that Commission guidance, which may require revenue recognition to be delayed beyond the period in which the vaccine is placed in the stockpile in some circumstances, may have the unintended consequence of causing some vaccine manufacturers to decline to participate in these critical stockpile programs. Although the Commission is not aware of any instance to date of a vaccine manufacturer declining to participate in these programs based on the resulting accounting, the Commission is publishing this guidance to remove the accounting questions from the debate.

Government vaccine stockpile programs are unique in many respects. For example, the primary objective of purchasing the vaccines is not to take delivery but rather to be able to require delivery on a moment's notice. The hope of both parties to these contracts is that the vaccines will never be needed and thus never delivered. Another unique characteristic of vaccine stockpile programs is the critical public policy objective of safeguarding the public health in the event of potentially catastrophic disease outbreaks. An additional unusual characteristic of vaccine stockpiles is the need for rotation of the stockpile due to limited shelf life. For these and other reasons, the Commission limits this guidance to the vaccines enumerated below (enumerated vaccines).

II. The Application of Generally Accepted Accounting Principles for Revenue Recognition to Vaccine Stockpiles [author-generated text]

The Commission historically has recognized pronouncements of the Financial Accounting Standards Board (FASB) as authoritative in the absence of any contrary determination by the Commission. FN1 More recently, in Financial Reporting Release No. 70, FN2 the Commission announced its determination that the FASB and its parent organization, the Financial Accounting Foundation, satisfied the criteria in section 108 of the Sarbanes-Oxley Act of 2002 FN3 and section 19(b) of the Securities Act of 1933 FN4 and, accordingly, FASB's financial accounting and reporting standards are recognized as "generally accepted" for purposes of the federal securities laws. As a result, registrants are required to comply with those standards in preparing financial statements filed with the Commission, unless the Commission provides otherwise. FN5

FN1 Rule 4-01(a)(1) of Regulation S-X, 17 CFR 210.4-01(a)(1). See Accounting Series Release ("ASR") No. 150 (December 20, 1973) and ASR No. 4 (April 25, 1938).

FN2 Release Nos. 33-8221; 34-47743; IC-26028; FR-70 (April 25, 2003) ("FR-70"); 68 FR 23333 (May 1, 2003).

FN3 15 U.S.C. 7218.

FN4 15 U.S.C 77s(b).

FN5 See FR-70; Rule 4-01(a)(1) of Regulation S-X, 17 CFR 210.4-01(a)(1).

Although no specific guidance has been published by the FASB related to revenue recognition for vaccine stockpiles, general criteria for revenue recognition are discussed in the FASB's Concepts Statements. Statement of Financial Accounting Concepts No. 5, Recognition and Measurement in Financial Statements of Business Enterprises (Concepts Statement 5) identifies two criteria necessary for revenue recognition: the revenue must be realized or realizable and earned. FN6 Concepts Statement 5 goes on to explain that "revenues are considered to have been earned when the entity has substantially accomplished what it must do to be entitled to the benefits represented by the revenues" FN7 and that the two conditions for revenue recognition are "usually met by the time product or merchandise is delivered...." FN8

FN6 See Concepts Statement 5, ¶183 (a) and (b).

FN7 Concepts Statement 5, ¶183(b).

FN8 Concepts Statement 5, ¶184(a).

In 1986, in Securities Exchange Act Release No. 23507 and Accounting and Auditing Enforcement Release No. 108, In the Matter of Stewart Parness (AAER 108), the Commission set forth criteria to be met in order to recognize revenue when delivery has not occurred. FN9 Of the seven criteria AAER 108 set forth as necessary for revenue recognition in the absence of delivery (commonly referred to as "bill and hold"), transfers of vaccines to government stockpiles sometimes do not satisfy the following two:

FN9 See In the Matter of Stewart Parness, AAER 108 (August 5, 1986). The Commission staff reiterated this guidance in Staff

Accounting Bulletin (SAB) Topic 13 in 1999 through the issuance of SAB 101.

There must be a fixed schedule for delivery of the goods; and

The ordered goods must have been segregated from the seller's inventory and not be subject to being used to fill other orders. FN10

FN10 See SAB Topic 13. A. 3 and AAER 108.

III. Current Commission Guidance [author-generated text]

Notwithstanding the Commission's previous guidance discussed above, the Commission will not object if vaccine manufacturers recognize revenue from the sale of enumerated vaccines related to Federal governmental stockpile programs if the arrangements meet the applicable revenue recognition criteria specified under generally accepted accounting principles and Commission rules and regulations, other than for the requirements associated with product delivery and inventory segregation noted above, so long as disclosures are provided that allow for a clear understanding by investors of the subject transactions, the related accounting, and the effect of this alternative accounting method in the financial statements.

The following vaccines are subject to this Release when sold to the Federal government for purposes of placing the vaccines into a Federal governmental vaccine stockpile (enumerated vaccines):

Childhood disease vaccines;

Influenza vaccines; and

Other vaccines and countermeasures sold to the Federal government for placement in the Strategic National Stockpile.

The Commission would not object if a registrant that sells enumerated vaccines elects this alternative accounting method beginning in the first fiscal quarter of the registrant's next fiscal year. If elected, the change in accounting represents a change in accounting principle under FASB Statement No. 154, Accounting Changes and Error Corrections. No preferability letter would be required if an accounting change is made solely in response to the adoption of the alternative method described above.

Any financial statements filed with the Commission before adoption of the provisions of this announcement would be subject to the disclosure provisions of SAB Topic 11-M, Disclosure of the Impact That Recently Issued Accounting Standards Will Have on the Financial Statements of a Registrant When Adopted in a Future Period.

Due to the uniqueness of the vaccine stockpile programs as discussed above, the alternative method is available only to the sales of enumerated vaccines by vaccine manufacturers and may not be extended by analogy to other circumstances.

IV. Financial Statement and Other Disclosures [author-generated text]

If the alternative accounting method is elected, the Commission believes that sufficient disclosures should be provided to allow for a clear understanding by investors of the subject transactions, related accounting, and the effect of the alternative accounting method in the financial statements. The following disclosures should be considered:

A. Material terms and conditions of contracts for which the alternative accounting method was selected, including all fees received and a description of each enumerated vaccine product that the vaccine manufacturer sells to vaccine stockpiles. The vaccine manufacturer should also describe the nature of its continuing involvement with the stockpiles for enumerated vaccine products for which revenue has been recognized, such as stock rotation. Additionally, the election of this alternative form of revenue recognition would generally be a significant accounting policy under APB Opinion No. 22, Disclosure of Accounting Policies. Vaccine manufacturers should clearly disclose that this alternative policy applies only to enumerated vaccine product sales.

B. Disclosures quantifying the effects of using the alternative policy on relevant balance sheet and income statement captions, including revenue, cost of sales, inventory and deferred revenue.

C. Supplemental disclosure of the market value of inventory available to be rotated out of vaccine stockpiles and of sales to third parties that were filled from vaccine stockpiles.

D. Supplemental disclosure of enumerated vaccine product quantities and related product sales revenue for enumerated vaccines actually delivered from stockpiles to the CDC or other party for use during the period (i. e., delivered out of stockpiles).

List of Subjects.

17 CFR Parts 231, 241, and 271.

Securities.

Amendments to the Code of Federal Regulations.

For the reasons set out in the preamble, the Commission is amending Title 17, chapter II of the Code of Federal Regulations as set forth below:

PART 231 – INTERPRETATIVE RELEASES RELATING TO THE SECURITIES ACT OF 1933 AND GENERAL RULES AND REGULATIONS THEREUNDER

Part 231 is amended by adding Release No. 33-8642 and the release date of December 5, 2005 to the list of interpretive releases.

PART 241 – INTERPRETATIVE RELEASES RELATING TO THE SECURITIES EXCHANGE ACT OF 1934 AND GENERAL RULES AND REGULATIONS THEREUNDER

Part 241 is amended by adding Release No. 34-52885 and the release date of December 5, 2005 to the list of interpretive releases.

PART 271 – INTERPRETATIVE RELEASES RELATING TO THE INVESTMENT COMPANY ACT OF 1940 AND GENERAL RULES AND REGULATIONS THEREUNDER

Part 271 is amended by adding Release No. IC-27178 and the release date of December 5, 2005 to the list of interpretive releases.

By the Commission.

Jonathan G. Katz

Secretary.

Dated: December 5, 2005.

8. Based on comments received, add heading and paragraph 410-30-S35-1, with no link to transition paragraph as follows:

> Appropriate Discount Rate to Be Applied to a Product or Environmental Remediation Liability

410-30-S35-1 See paragraph 450-20-S99-1, SAB Topic 5.Y, Accounting and Disclosures Relating to Loss Contingencies, Question 1.

9. Based on comments received, amend paragraph 450-20-S99-1, with no link to transition, as follows:

S99-1 The following is the text of SAB Topic 5.Y, Accounting and Disclosures Relating to Loss Contingencies.

Facts: A registrant believes it may be obligated to pay material amounts as a result of product or environmental remediation liability. These amounts may relate to, for example, damages attributed to the registrant's products or processes, clean-up of hazardous wastes, reclamation costs, fines, and litigation costs. The registrant may seek to recover a portion or all of these amounts by filing a claim against an insurance carrier or other third parties.

Question 1: Assuming that the registrant's estimate of an environmental remediation or product liability meets the conditions set forth in paragraph 132 of SOP 96-1 [paragraph 410-30-35-12] for recognition on a discounted basis, what discount rate should be applied and what, if any, special disclosures are required in the notes to the financial statements?

Interpretive Response: The rate used to discount the cash payments should be the rate that will produce an amount at which the environmental or product liability could be settled in an arm's-length transaction with a third party. SOP 96-1 ~~[paragraph 410-30-35-12]~~ further states that the discount rate used to discount the cash payments should not exceed the interest rate on monetary assets that are essentially risk free FN57 and have maturities comparable to that of the environmental or product liability.

{REMAINDER OF PARAGRAPH NOT REPRODUCED HERE}

10. Based on comments received, amend paragraph 810-10-S99-4, with no link to transition, as follows:

S99-4 The following is the text of Regulation S-X Rule 3A-04, Intercompany Items and Transactions.

In general, there shall be eliminated intercompany items and transactions between persons included in the (a) consolidated financial statements being filed and, as appropriate, (b) unrealized intercompany profits and losses on transactions between persons for which financial statements are being filed and persons the investment in which is presented in such statements by the equity method.

If such eliminations are not made, a statement of the reasons and the methods of treatment shall be made.

[37 FR 14597, July 21, 1972. Redesignated at 46 FR 56179, Nov. 16, 1981]

The text of Regulation S-X Rule 3A-05 can be found at 980-810-S99-1.

11. Based on comments received, amend 323-740-S99-1, with no link to transition, as follows:

S99-1 The following is the text of SAB Topic 6.I.2, Taxes of Investee Company.

Question: If a registrant records its share of earnings or losses of a 50% or less owned person on the equity basis and such person has an effective tax rate which differs by more than 5% from the applicable statutory Federal income tax rate, is a reconciliation as required by Rule 4-08(g) [paragraph 235-10-S99-1] necessary?

Interpretive Response: Whenever the tax components are known and material to the investor's (registrant's) financial position or results of operations, appropriate disclosure should be made. In some instances where 50% or less owned persons are accounted for by the equity method of accounting in the financial statements of the registrant, the registrant may not know the rate at which the various components of income are taxed and it may not be practicable to provide disclosure concerning such components.

It should also be noted that it is generally necessary to disclose the aggregate dollar and per-share effect of situations where temporary tax exemptions or "tax holidays" exist, and that such disclosures are also applicable to 50% or less owned persons. Such disclosures should include a brief description of the factual circumstances and give the date on which the special tax status will terminate. See Topic 11.C [paragraph 740-10-S99-2].

12. Based on comments received, amend 310-10-S50-2, with no link to transition, as follows:

S50-2 See paragraph 235-10-S99-4, Regulation S-X Rule 12-09, for the required disclosure ~~of~~ for the schedule of valuation and qualifying accounts, which would include reserves on receivables.

13. Based on comments received, amend 718-10-S50-1, with no link to transition, as follows:

S50-1 See paragraph 718-10-S99-1, SAB Topic 14.B, Question 4, for SEC Staff views on appropriate disclosures upon becoming a public entity in addition to those prescribed by paragraphs 718-10-50-1 through 50-~~4~~2.

14. Based on comments received, amend FN 39 in 718-10-S99-1, by italicizing the phrases, with no link to transition, as follows:

FN39 For purposes of this staff accounting bulletin, the phrase *expected or contractual term, as applicable* has the same meaning as the phrase *expected (if using a Black-Scholes-Merton closed-form model) or contractual (if using a lattice model) term of an employee share option*.

15. Based on comments received, amend 805-10-S55-3 as follows:

S55-3 See paragraph 805-10-S99-2, SAB Topic 2.A.8, , for SEC Staff views on the accounting for business combinations prior to or contemporaneous with an initial public offering.

16. Based on comments received, amend 932-360-S99-1(2), with no link to transition, as follows:

2. Estimates of Future Net Revenues

Facts: Paragraphs 30-34 of Statement 69 [paragraphs 932-235-50-29 through 50-36] require the disclosure of the standardized measure of discounted future net cash flows from production of proved oil and gas reserves, computed by applying year-end prices of oil and gas (with consideration of price changes only to the extent provided by contractual arrangements) to estimated future production as of the latest balance sheet date, less estimated future expenditures (based on current costs) of developing and producing the proved reserves, and assuming continuation of existing economic conditions.

Question 1: For purposes of determining reserves and estimated future net revenues, what price should be used for gas which will be produced after an existing contract expires or after the redetermination date in a contract?

Interpretive Response: The price to be used for gas which will be produced after a contract expires or has a redetermination is the current market price at the end of the fiscal year for that category of gas. This price may be increased thereafter only for additional fixed and determinable escalations, as appropriate, for that category of gas. A fixed and determinable escalation is one which is specified in amount and is not based on future events such as rates of inflation.

Question 2: What price should be applied to gas which at the end of a fiscal year is not yet subject to a gas sales contract?

Interpretive Response: The price to be used is the current market price for similarly situated gas at the end of the fiscal year provided the company can reasonably expect to sell the gas at the prevailing market price.

Question 3: To what extent should price increases announced by OPEC or by certain government agencies not yet effective at the date of the reserve report be considered in determining current prices?

Interpretive Response: Current prices should not reflect price increases announced but not yet effective at the date of the reserve valuation, i.e., the end of the fiscal year.

3. Disclosure of Reserve Information

a. Deleted by SAB 103 [author-generated text]

b. Unproved properties.

17. Based on comments received, subordinate paragraph 235-10-S99-1(m)(2)(i) as shown below, with no link to transition, as follows:

2) Reverse repurchase agreements (assets purchased under agreements to resell). [SX 210.4-08, paragraph (m)(2), sequence 47]]

(i) If, as of the most recent balance sheet date, the aggregate carrying amount of reverse repurchase agreements (securities or other assets purchased under agreements to resell) exceeds 10% of total assets: [SX 210.4-08, paragraph (m)(2)(i), sequence 48]

(A) Disclose separately such amount in the balance sheet; and [SX 210.4-08, paragraph (m)(2)(i), sequence 48]

(B) Disclose in an appropriately captioned footnote: [SX 210.4-08, paragraph (m)(2)(i), sequence 48]

(1) The registrant's policy with regard to taking possession of securities or other assets purchased under agreements to resell; and [SX 210.4-08, paragraph (m)(2)(i), sequence 48]

(2) Whether or not there are any provisions to ensure that the market value of the underlying assets remains sufficient to protect the registrant in the event of default by the counterparty and if so, the nature of those provisions. [SX 210.4-08, paragraph (m)(2)(i), sequence 48]

[(ii) If, as of the most recent balance sheet date, the amount at risk under reverse repurchase agreements with any individual counterparty or group of related counterparties exceeds 10% of stockholders' equity (or in the case of investment companies, net asset value), disclose the name of each such counterparty or group of related counterparties, the amount at risk with each, and the weighted average maturity of the reverse repurchase agreements with each. The amount at risk under reverse repurchase agreements is defined as the excess of the carrying amount of the reverse repurchase agreements over the market value of assets delivered pursuant to the agreements by the counterparty to the registrant (or to a third party agent that has affirmatively agreed to act on behalf of the registrant) and not returned to the counterparty, except in exchange for their approximate market value in a separate transaction. [SX 210.4-08, paragraph (m)(2)(ii), sequence 49]]

18. Based on comments received, amend 840-30-S99-2 as follows:

> > > SEC Observer Comment: Effect of a Change in Tax Law or Rates on Leveraged Leases

S99-2 The following is the text of SEC Observer Comment: Effect of a Change in Tax Law or Rates on Leveraged Leases.

~~It is sometimes necessary to determine how changes in corporate tax rates will require lessors under leveraged leases to recognize adjustments in their financial statements in the period that the new tax law is enacted because the change in tax rates is a change in an important assumption under paragraphs 840-30-35-38 through 35-40.~~ Section 840-30-35 requires that all components of a leveraged lease be recalculated from inception of the lease based on the revised after-tax cash flows arising from the change in the tax law, including revised tax rates. The difference between the amounts originally recorded and the recalculated amounts must ~~would~~ be included in income of the year in which the tax law is enacted.

~~The above~~ This accounting may have distortive effects on the ratio of earnings to fixed charges ("the ratio") as calculated. For example, a favorable after-tax effect might consist of an unfavorable adjustment to pretax income that is more than offset by a favorable adjustment to income tax expense. In those circumstances, despite the overall favorable effect, the ratio as calculated pursuant to the applicable instructions to Item 503(d) of Regulation S-K would be affected negatively because the "earnings" component of the ratio is based on pretax income.

In filings with the Commission the SEC staff will expect the cumulative effect on pretax income and income tax expense, if material, to be reported as separate line items in the income statement. SEC staff will not object to exclusion of an unfavorable pretax adjustment from the "earnings" component of the ratio, in cases in which the after-tax effect is favorable, provided that (1) such exclusion is adequately identified and explained in connection with all disclosures and discussions relating to the ratio and (2) supplemental disclosure is made of the ratio as calculated in accordance with the applicable instructions.

19. Amend paragraph 225-10-S00-1 as follows:

Paragraph Number	Action	Accounting Standards Update	Date
225-10-S99-7	Amended	2009-07	09/15/2009
225-10-S99-8	Amended	2009-07	09/15/2009

20. Amend paragraph 235-10-S00-1 as follows:

Paragraph Number	Action	Accounting Standards Update	Date
235-10-S99-1	Amended	2009-07	09/15/2009

21. Amend paragraph 310-10-S00-1 as follows:

Paragraph Number	Action	Accounting Standards Update	Date
310-10-S50-2	Amended	2009-07	09/15/2009

22. Amend paragraph 323-740-S00-1 as follows:

Paragraph Number	Action	Accounting Standards Update	Date
323-740-S99-1	Amended	2009-07	09/15/2009

23. Amend paragraph 330-10-S00-1 as follows:

Paragraph Number	Action	Accounting Standards Update	Date
330-10-S35-2	Amended	2009-07	09/15/2009

24. Amend paragraph 410-30-S00-1 as follows:

Paragraph Number	Action	Accounting Standards Update	Date
410-30-S35-1	Added	2009-07	09/15/2009

25. Amend paragraph 450-20-S00-1 as follows:

Paragraph Number	Action	Accounting Standards Update	Date
450-20-S99-1	Amended	2009-07	09/15/2009

26. Amend paragraph 605-10-S00-1 as follows:

Paragraph Number	Action	Accounting Standards Update	Date
605-10-S99-1	Amended	2009-07	09/15/2009

27. Amend paragraph 605-15-S00-1 as follows:

Paragraph Number	Action	Accounting Standards Update	Date
605-15-S99-1	Amended	2009-07	09/15/2009

28. Amend paragraph 718-10-S00-1 as follows:

Paragraph Number	Action	Accounting Standards Update	Date
718-10-S50-1	Amended	2009-07	09/15/2009
718-10-S99-1	Amended	2009-07	09/15/2009

29. Amend paragraph 805-10-S00-1 as follows:

Paragraph Number	Action	Accounting Standards Update	Date
805-10-S55-3	Amended	2009-07	09/15/2009

30. Amend paragraph 810-10-S00-1 as follows:

Paragraph Number	Action	Accounting Standards Update	Date
810-10-S99-4	Amended	2009-07	09/15/2009

31. Amend paragraph 840-30-S00-1 as follows:

Paragraph Number	Action	Accounting Standards Update	Date
840-30-S99-2	Amended	2009-07	09/15/2009

32. Amend paragraph 932-360-S00-1 as follows:

Paragraph Number	Action	Accounting Standards Update	Date
932-360-S99-1	Amended	2009-07	09/15/2009

33. Amend paragraph 942-210-S00-1 as follows:

Paragraph Number	Action	Accounting Standards Update	Date
942-210-S99-1	Amended	2009-07	09/15/2009