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October 25, 2011

Ms. Elizabeth M. Murphy, Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

Dear Ms. Murphy:

Microsoft appreciates the opportunity to provide comments on the inaugural Financial Reporting Series (FRS), "Measurement Uncertainty in Financial Reporting: How Much to Recognize and How Best to Communicate It". We commend the Office of the Chief Accountant for the establishment of the FRS and believe it will be an important factor in the proactive identification of risk related to, and areas for potential improvement in, financial reporting. Our high level comments are in regards to the disclosure aspects of measurement uncertainty and we are pleased that one of the focuses of the inaugural FRS will be on the information that investors find important to understand and assess measurement uncertainties.

Determining the right level of disclosure requirements for measurement uncertainty will not be an easy task, but we are encouraged that the FASB has a Disclosure Framework project on their agenda and the prospect that guidance may be provided for disclosures on estimates that require assumptions, judgments, or other internal inputs that could reasonably have been materially different. One of the objectives of the Disclosure Framework project is to seek ways to better integrate information provided in financial statements, Management's Discussion & Analysis (MD&A), and other parts of a reporting entity's financial reporting package. Microsoft believes it is essential that the SEC and FASB, along with their constituents, collaborate on this part of the Disclosure Framework project, as we believe this part of the project could be a critical aspect in improving disclosures regarding measurement uncertainty.

If you have any questions, please contact me at (425) 703-6094.

Sincerely,

Bob Laux
Senior Director, Financial Accounting and Reporting