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Peter M. Carlson
Executive Vice President and
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Mr. Brent Fields, Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

November 30, 2015

**Re: Request for Comment on the Effectiveness of Financial Disclosures about Entities Other than the Registrant (Release No. 33-9929; 34-75985; IC-31849)
Commission File No. S7-20-15**

Dear Mr. Fields:

MetLife, Inc. (“MetLife”) appreciates the opportunity to provide comments on the *Effectiveness of Financial Disclosures about Entities Other than the Registrant* (“Request for Comment”). MetLife, through its subsidiaries and affiliates, is a global provider of life insurance, annuities, employee benefits and asset management, with leading market positions in the United States, Japan, Latin America, Europe and the Middle East. In addition to being a U.S. registrant, MetLife is also a large institutional investor and a significant user of financial information provided by other U.S. registrants.

We commend the Securities and Exchange Commission (the “Commission” or “SEC”) for undertaking this important initiative. Disclosures should provide relevant information and insight to investors with clarity and directness. Appropriate disclosures about a company’s acquired businesses, subsidiaries not consolidated and 50 percent or less owned persons, guarantors and issuers of guaranteed securities, and affiliates whose securities collateralize registered securities can facilitate investors’ understanding of the importance that those items have on the reliability and accuracy of a company’s financial statements.

We note that the Commission is taking the appropriate steps in reconsidering the Regulation S-X financial reporting framework and exploring opportunities to reduce cost and complexity of regulatory compliance without sacrificing the usefulness of financial statements. We believe that there are broad opportunities for improvements of Regulation S-X. However, we are limiting our comments to financial information relating to equity method investees (S-X Rule 3-09, *Separate Financial Statements of Subsidiaries Not Consolidated and 50 Percent or Less Owned Persons* and S-X Rule 4-08(g), *General Notes to Financial Statements, Summarized financial information of subsidiaries not consolidated and 50 percent or less owned persons*), (the “Rules”).

Current U.S. GAAP and SEC guidance requires investors to disclose certain information in their financial statement footnotes related to significant, unconsolidated equity method investees. When certain thresholds are met for an individually significant investee or collectively significant investees, additional financial information is required to be disclosed regarding the investee(s). The Rules require separate audited annual financial statements of individual equity method investees that are significant at a 20% (i.e., investee's assets or pre-tax income represent 20% of assets or pre-tax income of the investor) threshold. The Rules also require summarized financial information for annual and interim periods for the aggregate of all equity method investees if significance exceeds 10% (i.e., investees' assets or pre-tax income represent 10% of assets or pre-tax income of the investor). The summarized financial information of the investees must be included in the investor's footnotes.

S-X Rule 3-09

We believe that separate disclosures about an individually significant equity method investee are useful in helping financial statements users make decisions about an entity. However, we do not believe that it is always necessary to provide separate financial statements about an investee, if sufficiently useful information can be provided through footnote disclosures. We believe that the Commission should allow registrants more latitude to use their judgment to elect to present summarized financial information about an investee in-lieu of separate financial statements. Such a provision would reduce the cost and complexity of obtaining separate financial statements without sacrificing the decision-usefulness of the registrant's financial statements to its users. The SEC could further reduce cost and complexity by limiting the period for which separate financial statements are required to the years in which the significance criteria were met.

S-X Rule 4-08(g)

When the 10% significance thresholds are met for collectively significant investees, aggregated financial information about the investees assets, liabilities and income are required to be disclosed. It is our view that these tests may not be a meaningful measure of significance for limited partnership and similar investments that are accounted for using the equity method as a result of applying the SEC guidance codified in ASC 323-30-S99-1. In these cases, the investors generally do not have significant influence over the operations of these investees and instead are merely passive investors. It is often impractical for investors holding a minor interest of often 1% to 5% in several hundred limited partnerships to exert any meaningful influence over the operations of such investees. We believe that the aggregate assets, liabilities and net income disclosures that are required by S-X Rule 4-08(g) do not provide decision-useful or relevant information to financial statement readers given the disparate nature of these investees in terms of investment types and the combining of income and losses from different funds. Additionally, the costs associated with complying with the existing requirements in S-X, Rule 4-08(g) can be significant when these types of investments are involved since the registrant must compile financial information from the financial statements of several hundred limited partnership-type investees to make the disclosure if the criteria are met. The elimination of these disclosure requirements would reduce complexity for preparers and eliminate disclosures that are not decision-useful to investors.

We believe that the scope of Regulation S-X Rule 4-08(g) should be limited to investments accounted for under the equity method where there is significant influence (i.e., 20% or more, unless rebuttable, ownership interest), consistent with GAAP promulgated by the Financial Accounting Standards Board ("FASB"). We recommend that the SEC consider eliminating SEC-specific disclosure required by S-X Rule 4-08(g) and work with the FASB to incorporate such in the ASC required disclosure.

In lieu of the aggregated financial information, we suggest allowing registrants to make disclosures about their investees in the notes to the financial statements that provides financial statement users with (a) a description of the nature and purpose of the investments held, (b) a description of the ownership interests

held in the investees, (c) the aggregate carrying amount of the investments, and (d) the aggregate amount of equity earnings recorded or other returns received.

We appreciate the opportunity to respond to the Request for Comment. If you have any questions on the contents of this letter, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "P.M. Carlson".

Peter M. Carlson

cc:

John C.R. Hele
Executive Vice President and
Chief Financial Officer