

May 27, 2025

Mr. Jackson Day, Technical Director
File Reference No. 2025-ED200
FASB
801 Main Avenue
PO Box 5116
Norwalk, CT 06856-5116

RE: Accounting for Debt Exchanges

Via email: director@fasb.org

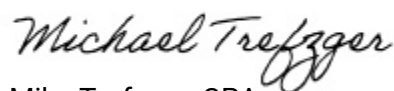
Dear Mr. Day:

The North Carolina Association of Certified Public Accountants (NCACPA), representing more than 12,000 members in public practice, industry, government, and education, welcomes the opportunity to respond to the Exposure Draft referenced above. This response represents the views of the NCACPA Accounting & Attestation Resource Group ("Resource Group") with input from the NCACPA staff.

The Resource Group supports the amendments in the proposed update. We commend the efforts of the FASB to address stakeholders' concerns that accounting for an exchange of debt instruments as a modification of the existing debt obligation, rather than as an extinguishment, does not reflect the economics of certain exchanges of debt instruments when the issuance of the new debt instrument and the contemporaneous repayment of the existing debt instrument are independent transactions.

Thank you for the opportunity to submit these comments. Please direct any questions or concerns to NCACPA Vice President of Advocacy and Outreach Robert Broome, CAE, at rbroome@ncacpa.org or (919) 481-5160.

Sincerely,



Mike Trefzger, CPA
Chair, Accounting & Attestation Resource Group

cc: NCACPA Board of Directors
NCACPA A&A Resource Group
Mark Sotichack, CPA, CGMA, NCACPA CEO