

Proposed Accounting Standards Update, *Intangibles-Goodwill and Other- Internal-Use Software (Subtopic 350-40): Customer Accounting for Fees Paid in a Cloud Computing Arrangement*

Question Text	Response
* Please select the type of entity or individual responding to this feedback form.	Accounting Firm/Auditor
Other, please specify (Specified)	
* Please provide contact information for any follow-up questions.	(Filled in as Follows:)
Organization *	Compliance Partners, LLC
First name *	Pw
Middle initial	
Last name *	Carey
Email address *	pwc.pwcarey@gmail.com
Phone number	1-650-264-9617
Should a customer in a cloud computing arrangement evaluate whether the arrangement involves a software license by applying the criteria in paragraphs 350-40-15-4A through 15-4C? If not, what guidance should be applied and why?	The customer should have already signed an SLA Contract Agreement stipulating with the CSP Cloud Service Provider their obligation to ensure the GRC (Governance, Risk & Compliance) of all their data and a CIA (Confidentiality, Integrity & Availability) of the customer after conducting a Risk Assessment and Risk Analysis of same by referring to the NIST CC WG dealing with Security, Privacy, and Forensics (National Institute of Standards & Technology).
Should an entity be permitted to elect prospective or retrospective transition?	Based upon their current and on-going business model they should be able to determine which is best for the integrity of their entity and in the best interests of their share holders....
Should the amendments in this proposed Update be effective for:  a. Public business entities for annual	Yes, a certain amount of uniformity makes it a tad easier for the good guys to apply and for the crooks to circumvent.....

Proposed Accounting Standards Update, *Intangibles-Goodwill and Other- Internal-Use Software*  
(Subtopic 350-40): *Customer Accounting for Fees Paid in a Cloud Computing Arrangement*

<p>periods, including interim periods within those annual periods, beginning after December 15, 2015, with early adoption permitted?</p> <p>b. All other entities for annual periods beginning after December 15, 2015, and interim periods in annual periods beginning after December 15, 2016, with early adoption permitted?</p>	
<p>Please provide any additional comments on the proposed Update:</p>	<p>Be sure to send these over to the SEC and PCAOB for their input, as we're sure they will be interested in same....</p>
<p>Please provide any comments on the electronic feedback process:</p>	<p>So far so good.....you all may want to share this format with other professional organizations, Regulatory and Standards, et al.....and our best wishes, too.l..</p> <p>Respectfully</p>
<p>Below is a printable summary of your responses to the questions in this feedback form.</p> <p>You can revise your responses by clicking the "Back" button.</p> <p>All comments received constitute part of the FASB's public file. The FASB will make all comments publicly available by posting them to the Online Comment Letters portion of its website.</p>	<p>Not Answered</p>