PLATFORM SPECIALTY
PRODUCTS CORPORATION

September 25, 2014

Ms. Susan Cosper
Technical Director
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116
Via email: director@fasb.org

RE: File Reference No. 2014-210

Dear Ms. Cosper:

Platform Specialty Products Corporation ("Platform", the "Company", and "We") appreciates the opportunity to comment the Proposed Accounting Standards update – *Simplifying the Measurement of Inventory* (the "Update") issued by the Financial Accounting Standards Board ("FASB").

Platform (NYSE: PAH) is a global producer of high technology specialty chemical products and provider of technical services. Our business involves the manufacture of a broad range of specialty chemicals, which we create by blending raw materials, and the incorporation of these chemicals into multi-step technological processes. These specialty chemicals and processes together encompass the products we sell to our customers in the electronics, metal and plastic plating, graphic arts, and offshore oil production and drilling industries. Thus, this proposal is important to us.

We believe the Update is an improvement in financial reporting for the same reasons described in the proposal; however, we believe the FASB should expand the scope of the Update to include simplifications to the accounting for inventory in business combinations. We have provided responses to the specific questions posed in the Update in the Appendix.

We believe the requirement to allocate the purchase price of an acquired business to inventory based upon its fair value is not decision useful for investors because the acquired inventory and the same inventory produced post acquisition flow through cost of goods sold at different amounts, which is significant in our industry. As a result, the gross margin reporting in our statement of operations in the months and quarters immediately following acquisition is not representative of future gross margins. As a result, the Company presents non-GAAP financial

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measures that adjusts out the mark up on acquired inventory in our communications to investors and creditors to facilitate their understanding of the Company's ongoing business.
We believe scoping out inventory from the requirements of allocating the purchase price to the assets acquired based upon fair value and allowing them to be carried over at the lower of historical cost of the acquired business or net realization value, as proposed in this Update, would be both a simplification and an improvement to the quality of financial reporting for the aforementioned reasons.

Further, we believe the FASB should consider similar adjustments to the accounting for other assets and liabilities acquired in a business combination that flow through the income statement within a year or the normal business cycle following an acquisition to avoid similar financial reporting that is routinely adjusted to provide users with decision useful information.

Thank you for considering our views. If you have any questions, please contact me at 203-575-5861.

Respectfully,
Bob Worshek

Bob Worshek
Chief Accounting Officer
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APPENDIX: Answers to specific questions posed in the Update

Question 1: Should inventory be measured at the lower of cost and net realizable value? If not, what other measurement is more appropriate and why?

Response: We support the measurement at the lower of cost and net realizable value including disclosure of the amount of inventory held at net realizable value because it is simpler to apply and understand. Further, we believe these are superior measures because replacement cost or net realizable value less an approximate normal profit margin are more subjective and their interplay with the cost basis is more difficult for users to understand the information presented in financial statements.

Question 2: Should the proposed Update be applied prospectively to the measurement of inventory after the date of adoption?

Response: We believe this proposed Update should be applied prospectively as we view the cost of applying it retroactively to outweigh the benefit of information users may obtain from it, which we believe is minimal since inventory is generally marked down to net realizable value in practice.

Question 3: Should the proposed Update be effective in annual periods, and interim periods within those annual periods, beginning after December 15, 2015, with early adoption permitted? Should there be a delay in the effective date for entities other than public business entities and why?

Response: Since the Update represents a simplification of accounting, we believe early adoption should be permitted to enable preparers of financial statement to avail themselves of this Update as soon as their systems and processes can be modified to implement it. Since the Update proposes what is generally applied in practice, we believe the proposed timeframe for the effective date appears adequate for all entities.

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