



September 30, 2014

Technical Director, File Reference No. 2014-210
Financial Accounting Standards Board
401 Merritt 7
Norwalk, CT 06856-5116

Re: File Reference No. 2014-210 Exposure Draft of the Proposed Accounting Standards Update – Inventories (Topic 330)

We are writing on behalf of the Emerging Standards Committee (ESC) of the Kentucky Society of Certified Public Accountants (KyCPA). The KyCPA is the sole professional organization representing CPAs in the Commonwealth of Kentucky. Its 5,100 members are engaged in business communities throughout the Commonwealth and have a comprehensive grassroots view of the needs of businesses, ranging from large public companies to small owner-managed businesses. KyCPA's ESC consists of a group of KyCPA members organized to monitor the activities of accounting and auditing standard setters, as well as government authorities, with the objective of participating in the standards-setting process by providing thoughtful comment on developing issues.

Our comments for your consideration are as follows:

Overall Comments – We agree with the proposed ASU in its entirety. We are very supportive of the FASB's efforts to simplify and eliminate costly reporting that does not provide a benefit to related financial statement users. Further, we do not believe a delay in the effective date for entities other than public business entities is necessary.

Other Areas for Simplification – We believe other areas in U.S. GAAP where simplification should be evaluated include: Stock based compensation, Income taxes and Debt classification. We also believe simplification should be an objective within the FASB's Disclosure Framework project. Specifically, scalability should be addressed and demonstrated with examples. While we understand current U.S. GAAP does not preclude this notion, practice, together with the regulatory environment has hindered its application. Accordingly, we suggest the Board codify scalability within the Accounting Standards Codification. Specific areas where scalability could be applied include: Pensions, Stock based compensation and Income taxes, among others.

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Thank you very much for considering our thoughts.

Sincerely,

A handwritten signature in blue ink that reads "Glenn Bradley". The signature is written in a cursive style with a large initial "G".

Glenn Bradley, CPA, Chair
On behalf of the Emerging Standards Committee
Kentucky Society of CPAs