

September 30, 2014

Technical Director
FASB
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

Re: **File Reference No. 2014-210**

Dear Technical Director,

Please find below my comments on the FASB Exposure Draft on the Proposed Accounting Standards Update on *Inventory (Topic 330), Simplifying the Measurement of Inventory*:

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: Yes.

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

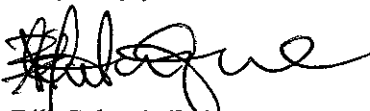
RESPONSE: No. To avoid potential comparability issues among financial statement users, the proposed update should be applied retroactively in the measurement of inventories reported in prior period financial statements that are presented together with the financial statements after the period of adoption, unless, the reporting entity can satisfactorily substantiate that such retroactive adoption is not economically feasible.

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: Yes, to the first question. No, to the second question.

Thank you for the opportunity to give the foregoing comments.

Very truly yours,



Bill Gabunia Debuque, CPA CFE CGMA
Glenolden, Pennsylvania