



October 7, 2014

Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

Re: Accounting Standards Update ("ASU") 2014-09: Revenue from Contracts with Customers

CA Technologies, Inc. ("CA") is supportive of the FASB's issuance of ASU 2014-09, which is intended to achieve convergence across industries and capital markets. We are committed to improving consistency and comparability of accounting practices across entities. However, we request that the FASB delay the effective date of the newly issued standard for public companies to allow those most affected by the revenue recognition practice changes, the additional time needed to successfully implement the newly issued standard.

CA closely monitored the progress of the revenue recognition project throughout the FASB's deliberations over the project. Although CA has been planning for implementation of the new standard, the delay in issuing the final standard without a corresponding delay in the effective date has reduced the time given to companies to finalize implementation plans and modify system requirements. Only since the standard was finalized and made public in May 2014, have practitioners and companies been able to move towards finalizing an interpretation of the standard.

In our effort to interpret the standard, CA has identified areas which warrant further time to assess. Some of these challenges are currently being discussed by the AICPA Industry Task Forces on which CA is participating. For example, consider companies with customer contracts or business cycles which extend beyond one year: the transition guidance is having an immediate impact which we do not believe was the intent of the FASB. A cumulative effect (prospective) transition would cause companies to never recognize some revenue in the income statement and this would affect companies entering into multi-year contracts today; a retrospective transition would require system implementations to be complete within the next three months. Time will also be needed to educate the investment community as to the changes and their impact on company financial statements under either transition approach.

The changes required by the new standard are so significant that companies require additional time to appropriately analyze the new guidance, as well as implement new systems and internal controls in compliance with Sarbanes-Oxley Act ("SOX") Section 404 requirements and the Internal Control—Integrated Framework that was published in 2013 by the Committee of Sponsoring Organizations of the Treadway Commission ("COSO"). Preparers and users of company financial statements would benefit from the FASB extending the effective date of the new standard.

Thank you for taking the time to consider our request. I am available to discuss further.

Respectfully,

A handwritten signature in black ink, appearing to read 'Neil Manna', written in a cursive style.

Neil Manna
Chief Accounting Officer