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Technical Director  
Financial Accounting Standards Board  
Director@fasb.org

RE: File Reference No. 2015-200-I & File Reference No. 2015-210-II

Dear Director:

I am the Director of Tax of Bumble Bee Foods, LLC a billion dollar food manufacturer located in San Diego, CA.

In response to the Board's request for comments on the January 22, 2015 proposal, *Income Taxes (Topic 740): (I) Intra-Entity Asset Transfers and (II) Balance Sheet Classification of Deferred Taxes*, I disagree with the proposed timeline of implementation, and wish to address Question 4 of the Questions for Respondents.

*Questions: Should the amendments in this proposed Update be effective for:*

- a. Public business entities for annual periods, including interim periods within those annual periods, beginning after December 15, 2016*
- b. All other entities for annual periods beginning after December 15, 2017, and interim periods in annual periods beginning after December 15, 2018, with early adoption permitted, but not before the effective date for public business entities?*

The amendments should be effective for all entities for annual and interim periods including the adoption date of the amendment.

The primary objective of the Board's Simplification Initiative is to improve areas of GAAP where complexity can be reduced. If this is indeed the case, then it is in line with this objective to eliminate the complexity required of companies under the current guidance as soon as possible, not two or three years from now.

There is no compelling benefit to delaying simplification, while it certainly stands to reason that continuing the difficult tasks of tracking intra-entity assets and their corresponding deferred tax implications, or classifying deferred taxes under the current inconsistent models, significantly outweighs the costs of transitioning to the simplified methods.

I petition the Board to require the earliest common effective date for all entities and not delay simplification that is clearly a benefit to all business entities, public and private.

Regards,



Craig Forman, CPA