

Proposed Accounting Standards Update, Revenue from Contracts with Customers (Topic 606): Deferral of the Effective Date

Question Text	Response
* Please select the type of entity or individual responding to this feedback form.	Preparer
Other, please specify (Specified)	
* Please provide contact information for any follow-up questions.	(Filled in as Follows:)
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<p>1. Should the effective date of the guidance in Update 2014-09 be deferred for one year for public business entities, certain not-for-profit entities, and certain employee benefit plans? Please explain why.</p>	<p>Yes.</p> <p>The effective date of the guidance in Update 2014-09 should be deferred one year for public business entities, certain non-for-profit entities and certain employee benefit plans due to the fact there are clarifications being issued by the FASB in the form future of Accounting Standard Updates later in 2015 that preparers, industry task forces and auditors will need time to review and incorporate any affect of the clarifying guidance into their implementation plans.</p> <p>Specific matters we and the Hospitality and Timeshare AICPA Task Forces are in process of evaluating as it relates to the implementation of the new standard include the following:</p> <p>a) performance obligation determinations and b) contracts with licenses and other goods and services.</p> <p>As the FASB has recently released additional clarifying guidance in the form of an Exposure Draft released in May 2014 related to these areas, the additional year will allow us implement the standard effectively with the appropriate level of internal oversight while not expending extensive accounting and consulting fees in order to expedite an implementation of the standard in light of the incremental clarifying guidance recently issued.</p>

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<p>2. Should the effective date of the guidance in Update 2014-09 be deferred for one additional year for all other entities? Please explain why.</p>	<p>Yes.</p> <p>The effective date of the guidance should be deferred one year for all other entities due to the fact there are clarifications being issued by the FASB in the form of Accounting Standard Updates in 2015 that preparers will need time to review and incorporate impacts into their implementation plans similar to the discussion in the answer to question 1.</p>
<p>3. In addition to providing a one- year deferral of the effective date of the guidance in Update 2014-09, should the Board also provide an optional two- year deferral for all entities that apply that guidance retrospectively to each reporting period presented? Please explain why.</p>	<p>Yes.</p> <p>The FASB should provide an optional two-year deferral for all entities that apply the guidance in Update 2014-09 retrospectively. This optional deferral period will allow preparers sufficient time to effectively implement any system and internal control changes required, as well as allow auditors sufficient time to audit the retrospective adoption, as well as internal control changes due to the fact there will be additional guidance exposure drafts issued for comment and finalized throughout 2015. As an issuer that will potentially be affected by the guidance clarifications issued, or expected to be issued in 2015, we will require the additional year to effectively make changes to our policies, processes, contracting and financial systems required to implement the new standards.</p>
<p>4. Should earlier application of the guidance in Update 2014-09 be permitted as of the effective date originally included in Update 2014-09? Please explain why.</p>	<p>Yes.</p> <p>Early adoption of the guidance in Update 2014-09 should be permitted as long as the FASB does not foresee significant changes to the guidance in subsequent standard updates.</p>
<p>Please provide any additional comments on the proposed Update:</p>	<p>We recommend that the Board and IASB strive to align effective dates.</p>
<p>Please provide any comments on the electronic feedback process:</p>	