



Crowe Horwath LLP
Independent Member Crowe Horwath International
One Mid America Plaza, Suite 700
Post Office Box 3697
Oak Brook, Illinois 60522-3697
Tel 630.574.7878
Fax 630.574.1608
www.crowehorwath.com

May 29, 2014

Ms. Susan Cospers
Technical Director
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, Connecticut 06856-5116

Via email to director@fasb.org

RE: File Reference No. 2015-240

Dear Ms. Cospers:

We are pleased to comment on the Financial Accounting Standards Board's (FASB or Board) Proposed Accounting Standards Update, *Revenue from Contracts with Customers (Topic 606); Deferral of the Effective Date*.

We are supportive of the Board's proposal to defer the effective date of Topic 606 for one year from the date currently specified. In addition, we are supportive of the Board's proposal to defer the effective date for one additional year for all entities that apply the new guidance retrospectively to each reporting period. We believe the benefits of retrospective application compensate for the delayed adoption and potential lack of comparability between some entities for the one additional year. We also support the option for early adoption as of the Standard's original effective date as some preparers have been on track to adopt the provisions of Topic 606 as of the original effective date and those efforts should not be disregarded.

We believe the deferral is needed given the efforts by the FASB to clarify and improve the guidance in Topic 606, as evidenced by the recently issued proposal to address implementation issues surrounding performance obligations and licensing. In addition, we believe that the deferral is needed to allow preparers sufficient time to make any needed modifications to their accounting systems based on the final guidance.

Please contact Jim Dolinar at (630) 574-1649 or jim.dolinar@crowehorwath.com or Scott G. Lehman at (630) 574-1605 or scott.lehman@crowehorwath.com should you have any questions.

Cordially,

Crowe Horwath LLP

Crowe Horwath LLP