

Technical Director  
Director@fasb.org

**File Reference No. 2015-240**

RubinBrown LLP appreciates the opportunity to comment on the FASB's Proposed Accounting Standards Update (ASU), *Revenue from Contracts with Customers (Topic 606): Deferral of the Effective Date*. We support the Board's proposal to defer the effective date of ASU 2014-09, *Revenue from Contracts with Customers*. We support the deferral for all entities.

Our responses to the questions posed in the exposure draft are as follows:

**Question 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.

Yes, we believe there should be a one-year deferral for public business entities, certain not-for-profit entities, and certain employee benefit plans. We think the deferral is appropriate for the reasons provided by the Board in their "Basis for Conclusions" in the exposure draft.

**Question 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.

Yes, we also support a one-year deferral for all other entities for the same reasons referred to above.

**Question 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.

No, an optional two-year deferral would lead to an additional year of non-comparability. A one-year deferral should be sufficient if the Board finalizes proposed amendments to the standard as soon as possible.

**Question 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.

We support allowing early adoption for those entities that are ready to adopt ASU 2014-09 and wish to do so as of the dates in the ASU.

We appreciate the opportunity to provide our comments on this exposure draft.

Sincerely,



RubinBrown LLP  
May 29, 2015