The Association of Accountants and Financial Professionals in Business

June 3, 2015

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

Re: File Reference No. 2015-260, Exposure Draft of Proposed Accounting Standards Update (ASU) – *Simplifying the Accounting for Measurement-Period Adjustments*

Dear Ms. Cosper:

The Financial Reporting Committee (FRC) of the Institute of Management Accountants (IMA) is writing to share its views on the Financial Accounting Standards Board's (FASB) Exposure Draft of Proposed ASU – *Simplifying the Accounting for Measurement-Period Adjustments.*

The IMA is a global association representing over 75,000 accountants and finance team professionals. Our members work inside organizations of various sizes, industries and types, including manufacturing and services, public and private enterprises, not-for-profit organizations, academic institutions, government entities and multinational corporations. The FRC is the financial reporting technical committee of the IMA. The committee includes preparers of financial statements for some of the largest companies in the world, representatives from the world's largest accounting firms, valuation experts, accounting consultants, academics and analysts. The FRC reviews and responds to research studies, statements, pronouncements, pending legislation, proposals and other documents issued by domestic and international agencies and organizations. Additional information on the FRC can be found at www.imanet.org (About IMA, Advocacy Activity, Areas of Advocacy, Financial Reporting Committee).

We have noted in many comment letters to the FASB our concern about the complexity of financial reporting requirements and, in a letter dated May 27, 2014, we expressed our support of the Board's Simplification Initiative. We are pleased to see the Initiative result in this proposed ASU.

We support the simplification of the accounting for adjustments to provisional amounts identified during the measurement period of a business combination by eliminating the need to make these adjustments retrospectively by changes to prior period financial statements and requiring these adjustments to be reflected in the financial statements of the reporting period in which the adjustment amount is determined. The acquirer would record in that period the effect of the adjustment on earnings in depreciation, amortization, and any other income effects calculated as if the accounting had been completed at the acquisition date. This is generally consistent with the current accounting for changes in estimates.

We would be pleased to discuss our comments with the Board or the FASB staff at your convenience.

Sincerely,

NSchroeder

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