

Ms. Susan Cospers  
Technical Director  
FASB  
401 Merritt 7  
PO Box 5116  
Norwalk, CT 06856-5116

July 12, 2016

RE: File Reference No. 2016-230

Dear Ms. Cospers:

The purpose of this letter is to respond to the FASB's Proposed Accounting Standards Update 2016-230 entitled: "Intangibles—Goodwill and Other (Topic 350) Simplifying the Accounting for Goodwill Impairment," issued May 12, 2016. Even though the comment period expired yesterday, I hope the FASB will find the following comment helpful.

The "writeoff model" referred to in BC26 is not found in the extant accounting standards codification, the concept statements or the FASB's website. A "write-off approach" is referred to in ASU 2014-02 (Goodwill) as the concept of writing off all goodwill to either earnings or equity upon acquisition and thereby eliminating any need for subsequent measurement. In the case where a concept is referred to in a FASB document, but is not included in the codification or the concept statements, I suggest that a description of that concept be included in the document where it is employed.

Regards,

Allen Hunt