



July 25, 2016

Technical Director, File Reference No. 2016-230
Financial Accounting Standards Board
401 Merritt 7
Norwalk, CT 06856-5116

Re: File Reference No. 2016-230 Exposure Draft of the Proposed Accounting Standards Update – Intangibles – Goodwill and Other (Topic 350)

We are writing on behalf of the Emerging Standards Committee (ESC) of the Kentucky Society of Certified Public Accountants (KyCPA). The KyCPA is the sole professional organization representing CPAs in the Commonwealth of Kentucky. Its 5,100 members are engaged in business communities throughout the Commonwealth and have a comprehensive grassroots view of the needs of businesses, ranging from large public companies to small owner-managed businesses. KyCPA's ESC consists of a group of KyCPA members organized to monitor the activities of accounting and auditing standard setters, as well as government authorities, with the objective of participating in the standards-setting process by providing thoughtful comment on developing issues.

Our comments for your consideration are as follows:

Overall Comments – We agree with the proposed ASU in its entirety. We are very supportive of FASB's efforts to simplify and eliminate costly reporting that does not provide a benefit to related financial statement users. Further, we believe early adoption should be permitted for the one-step impairment test.

We do not believe it should be required that non-public entities disclose the existence of reporting units with zero or negative carrying amounts as we do not believe such users find this information beneficial.

Thank you very much for considering our thoughts.

Sincerely,

Glenn Bradley, CPA, Chair
On behalf of the Emerging Standards Committee
Kentucky Society of CPAs