

December 30, 2016

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

By e-mail: director@fasb.org

**Re: Proposed Accounting Standards Update—*Compensation—Stock Compensation*
(Topic 718): *Scope of Modification Accounting***

(File Reference No. 2016-360)

Dear Ms. Cospers:

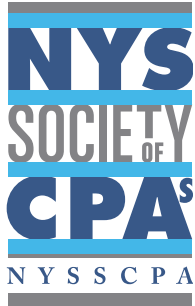
The New York State Society of Certified Public Accountants (NYSSCPA), representing more than 26,000 CPAs in public practice, business, government and education, welcomes the opportunity to comment on the above-captioned exposure draft.

The NYSSCPA's Financial Accounting Standards Committee deliberated the proposed accounting standards update and prepared the attached comments. If you would like additional discussion with us, please contact Craig T. Goodman, Chair of the Financial Accounting Standards Committee, at (212) 324-7048, or Ernest J. Markezin, NYSSCPA staff, at (212) 719-8303.

Sincerely,

F. Michael Zovistoski
President

Attachment



**NEW YORK STATE SOCIETY OF
CERTIFIED PUBLIC ACCOUNTANTS**

**COMMENTS ON
PROPOSED ACCOUNTING STANDARDS UPDATE—*COMPENSATION—STOCK
COMPENSATION (TOPIC 718): SCOPE OF MODIFICATION ACCOUNTING***

(File Reference No. 2016-360)

December 30, 2016

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Margaret A. Wood**

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New York State Society of Certified Public Accountants

Comments on

Proposed Accounting Standards Update—*Compensation—Stock Compensation (Topic 718): Scope of Modification Accounting*

(File Reference No. 2016-360)

General Comments

We welcome the opportunity to respond to the Financial Accounting Standards Board's (FASB or the Board) invitation to comment on the Proposed Accounting Standards Update—*Compensation—Stock Compensation (Topic 718): Scope of Modification Accounting* (Proposed Update).

Specific Comments

We have the following responses to questions posed in the Proposed Update.

Question 1: Do you agree with the amendments in this proposed Update about when an entity is required to apply modification accounting? If not, why?

Response: We agree with the amendments in this Proposed Update.

Question 2: Should new or different disclosures be included in Topic 718 as a result of the amendments in this proposed Update? If yes, what are those disclosures and why would they be useful to financial statement users?

Response: In our view new or different disclosures do not need to be included in Topic 718 as a result of the amendments in this Proposed Update.

Question 3: Are the transition requirements appropriate? If not, what transition approach is more appropriate and why?

Response: We believe the transition requirements are appropriate.

Question 4: How much time would be needed to adopt the amendments in this proposed Update? Should the amount of time needed to apply the amendments in this proposed Update by entities other than public business entities be different from the amount of time needed by public business entities? Should early adoption be permitted? If yes to either question, please explain why.

Response: The provisions of the Proposed Update are clear and straight forward to apply. We believe that the amount of time needed to apply the amendments in this Proposed Update by entities other than public business entities will not be different from the amount of time needed by public business entities. Early adoption should be permitted at the option of the reporting entity.