

Record ID: 636392015492530453

Question Text	Response	Status
* Please select the type of entity or individual responding to this feedback form.	Accounting Firm/Auditor	Completed
Other, please specify (Specified)		
* Please provide contact information for any follow-up questions.	(Filled in as Follows:)	Completed
Organization *	Patterson Hardee & Ballentine, PC	
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Should all common control arrangements (that is, for both private companies and public business entities) be excluded from the scope of VIE guidance (as opposed to just an option for private companies as provided in the amendments in this proposed Update)? Please explain.	Yes. This has been an overly complicated requirement for small entities with no real value added.	Completed
Do you agree that a private company (reporting entity) should have an option to not apply VIE guidance to legal entities under common control if both the common control parent and	Yes. Giving small entities the option to opt-out simplifies and reduces accounting requirements.	Completed

08/24/2017

<p>the legal entity being evaluated for consolidation are not public business entities? If not, please explain why.</p>		
<p>Should the current accounting alternative for private company leasing arrangements under common control provided under Update 2014-07 be retained, or should it be replaced by the proposed broader private company alternative, assuming this proposed Update is finalized? Would the proposed accounting alternative continue to address the concerns of private companies currently applying the accounting alternative for leasing arrangements under common control? If not, please explain why. Additionally, what existing leasing arrangements that are eligible to be accounted for using the current alternative, if any, would not be captured by the accounting alternative in the proposed amendments?</p>	<p>Broader private company reporting under the alternative would be a welcome change.</p>	<p>Completed</p>
<p>Do the proposed disclosure</p>	<p>Yes.</p>	<p>Completed</p>

08/24/2017

<p>requirements in paragraphs 810-10-50-2AG through 50-2AI adequately provide information about a reporting entity's involvement with and exposure to a legal entity? If not, please explain why. Also, please elaborate on any additional disclosures that you consider necessary to appropriately reflect a reporting entity's involvement with and exposure to a legal entity.</p>		
<p>Should indirect interests held through related parties that are under common control with a decision maker or service provider be considered on a proportionate basis, as opposed to being considered the equivalent of a direct interest in its entirety, when determining whether a decision-making fee is a variable interest in a VIE? If not, please explain why.</p>	<p>No. This provides no additional value to most clients.</p>	<p>Completed</p>
<p>Should a reporting entity be required to determine whether a controlling financial interest exists at the reporting entity level for situations in which power is shared among related parties or</p>	<p>No. Again, this provides no additional value to most clients.</p>	<p>Completed</p>

08/24/2017

<p>when related parties under common control, as a group, have a controlling financial interest but the parties individually do not? In doing so it is acknowledged that, in certain situations, it is possible that no reporting entity under common control will consolidate a VIE. If not, please explain why.</p>		
<p>Are the factors in paragraph 810-10-25-44A adequate for determining whether a reporting entity within a common control group may be the primary beneficiary of a VIE? If not, please explain why and describe what other factors you would recommend.</p>	<p>This needs to be simplified.</p>	<p>Completed</p>
<p>Does the “related party tie-breaker” test currently in GAAP (paragraph 810-10-25-44) result in appropriate consolidation results? If yes, please explain why. Alternatively, would the amendments in this proposed Update cause unintended consequences or allow reporting entities to achieve a desired</p>		<p>Completed</p>

08/24/2017

<p>consolidation result that is inconsistent with the economics of a related party arrangement? If yes, please explain how.</p>		
<p>Do you agree with the proposed transition requirements in paragraph 810-10-65-9? If not, what transition approach would be more appropriate?</p>	<p>Yes.</p>	<p>Completed</p>
<p>Should a reporting entity be required to provide the transition disclosures specified in this proposed Update? Should any other disclosures be required? If so, please explain why.</p>	<p>No.</p>	<p>Completed</p>
<p>How much time is needed to implement the proposed amendments?</p>	<p>None.</p>	<p>Completed</p>
<p>Should the proposed amendments be effective on the same date for both public business entities and entities other than public business entities?</p>	<p>Yes.</p>	<p>Completed</p>
<p>Should the effective date of the private company accounting alternative be consistent with the amendments in Accounting</p>	<p>Not necessary.</p>	<p>Completed</p>

08/24/2017

<p>Standards Update No. 2016-03, Intangibles— Goodwill and Other (Topic 350), Business Combinations (Topic 805), Consolidation (Topic 810), Derivatives and Hedging (Topic 815): Effective Date and Transition Guidance?</p>		
<p>Please provide any additional comments on the proposed Update:</p>	<p>Smaller, non public entities continue to be weary and wary of all the accounting changes. With revenue recognition and lease accounting changes, they have enough to deal with. They need a break.</p>	<p>Completed</p>
<p>Please provide any comments on the electronic feedback process:</p>		<p>Completed</p>
<p>Below is a printable summary of your responses to the questions in this feedback form.</p> <p>You can revise your responses by clicking the "Back" button.</p> <p>All comments received constitute part of the FASB's public file. The FASB will make all comments publicly available by posting them to the Online Comment Letters portion of its website.</p> <p>If you are finished providing comments, click the</p>	<p>Not Answered</p>	<p>Not Answered</p>

08/24/2017

2017-240
Comment Letter No. 7

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