



September 6, 2017

Technical Director  
File Reference No. 2017-240  
Financial Accounting Standards Board  
Via email: [director@fasb.org](mailto:director@fasb.org)

Re: Proposed Accounting Standards Update – *Consolidation (Topic 810)*

Technical Director and Board Members:

The Accounting & Auditing Committee of The Ohio Society of CPAs is pleased to provide comment on the above-referenced Proposed Accounting Standards Update.

The Committee is a voluntary group of member CPAs from public practice and industry. Our comments represent the collective views of the Committee members and not the individual views of the members or the organizations with which they are affiliated. The organization of our Committee is outlined in Appendix A to this letter.

#### General Comments

The committee is supportive of the proposed Accounting Standards Update, as private companies should have the option to not apply VIE guidance to legal entities under common control, if both the parent of the commonly controlled group and the entity being evaluated for consolidation are not public companies.

Many private entities have shared ownership structures that make the determination of controlling interests difficult, and consolidated reporting at times does not meet the decision needs of users and creditors. Providing the option for the most decision-useful reporting for private entities, with disclosures, is in the public interest.

The committee appreciates the opportunity to respond to the Proposed Accounting Standards Update. If you have any questions, please contact either of us at the below email addresses.

Best Regards,

Angela Lewis, CPA, Chair  
OSCPA Accounting and Auditing Committee  
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Jami Blake, CPA, Member  
OSCPA Accounting and Auditing Committee  
[jblake@cohencpa.com](mailto:jblake@cohencpa.com)

**The Ohio Society of CPAs  
2017-2018 Accounting and Auditing Committee**

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**APPENDIX A**

Chair: Angela Lewis, CPA, Crowe Horwath LLP

Members:

William Bauder, CPA, Holbrook & Manter, CPAs Inc.

Jami Blake, CPA, Cohen & Company, Ltd.

Thomas Bowns, CPA, Flynn & Company Inc.

Mark Freudenberg, CPA, Telhio Credit Union

Barry Garvin, CPA, Garvin Zwick & Goldman LLC

Robert Kitchen, CPA, Clark Schaefer Hackett & Co.

Ruth Peake, CPA, Medical Mutual of Ohio

Charles Randall, CPA, AF Group

Allen Waddle, CPA, Maloney + Novotny, LLC