

November 13, 2017

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: Two Proposed Accounting Standards Updates—Technical Corrections and
Improvements to Recently Issued Standards:
I. Accounting Standards Update No. 2016-01, *Financial Instruments—Overall (Subtopic
825-10): Recognition and Measurement of Financial Assets and Financial Liabilities* and
II. Accounting Standards Update No. 2016-02, *Leases (Topic 842)***

(File Reference No. 2017-300, 2017-310)

Dear Ms. Cospers:

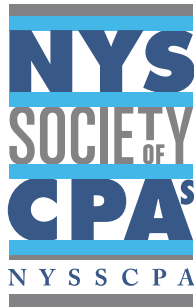
The New York State Society of Certified Public Accountants (NYSSCPA), representing more than 26,000 CPAs in public practice, business, government and education, welcomes the opportunity to comment on the above-captioned exposure draft.

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 Margaret A. Wood, Chair of the Financial Accounting Standards Committee, at (201) 401-7844, or Ernest J. Markezin, NYSSCPA staff, at (212) 719-8303.

Sincerely,

Harold L. Deiters III
President

Attachment



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

COMMENTS ON

***TWO PROPOSED ACCOUNTING STANDARDS UPDATES—TECHNICAL
CORRECTIONS AND IMPROVEMENTS TO RECENTLY ISSUED STANDARDS:
I. ACCOUNTING STANDARDS UPDATE NO. 2016-01, FINANCIAL INSTRUMENTS—
OVERALL (SUBTOPIC 825-10): RECOGNITION AND MEASUREMENT OF FINANCIAL
ASSETS AND FINANCIAL LIABILITIES AND
II. ACCOUNTING STANDARDS UPDATE NO. 2016-02, LEASES (TOPIC 842)***

(File Reference No. 2017-300, 2017-310)

November 13, 2017

Principal Drafter

Jeffrey A. Keene

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NYSSCPA Staff

Ernest J. Markezin

New York State Society of Certified Public Accountants

Comments on

Two Proposed Accounting Standards Updates—Technical Corrections and Improvements to Recently Issued Standards:

- I. Accounting Standards Update No. 2016-01, *Financial Instruments—Overall (Subtopic 825-10): Recognition and Measurement of Financial Assets and Financial Liabilities* and
- II. Accounting Standards Update No. 2016-02, *Leases (Topic 842)*

(File Reference No. 2017-300, 310)

General Comments

We welcome the opportunity to respond to the Financial Accounting Standards Board’s (FASB or the Board) invitation to comment on the Two Proposed Accounting Standards Updates, Technical Corrections and Improvements to Recently Issued Standards: I. Accounting Standards Update No 2016-01 *Financial Instruments – Overall (Subtopic 825 -10): Recognition of Financial Assets and Financial Liabilities* and II. Accounting Standards No. 2016-02 *Leases (Topic 842)* (Proposed Updates).

We agree with both of the Proposed Updates and have provided our responses to the specific questions included in the Proposed Updates below.

Specific Comments

- I. Accounting Standards Update No. 2016-01, *Financial Instruments—Overall (Subtopic 825-10): Recognition and Measurement of Financial Assets and Financial Liabilities*

Question 1: The proposed amendments are intended to improve the clarity of the guidance in Update 2016-01. Would the proposed amendments clarify that guidance? If not, please explain which proposed amendment(s) would not provide clarification, and why.

Response: Yes, the proposed amendments clarify the guidance in Update 2016-01.

Question 2: Will any of the proposed amendments result in substantive changes to the application of Update 2016-01 that would require transition provisions or an effective date for the final amendments other than as noted in the Summary section “When Would the Amendments Be Effective?” If so, please describe.

Response: No.

Question 3: Should other changes be made that are directly or indirectly related to the proposed amendments? Please note that the Board will conduct Codification improvements projects on a

periodic basis and additional changes may be postponed to a subsequent Codification improvements project.

Response: We believe that postponement is appropriate in this circumstance.

II. Accounting Standards Update No. 2016-02, *Leases (Topic 842)*

Question 1: Would the amendments in this proposed Update clarify the guidance in Topic 842 or provide a better link between paragraphs within Topic 842 or between the guidance in Topic 842 and other Topics? If not, please explain which proposed amendment(s) you disagree with and why.

Response: We agree.

Question 2: Will any of the proposed amendments result in substantive changes to the application of Topic 842 that would require transition provisions or an effective date for the final amendments other than those noted in the Summary section “When Would the Amendments Be Effective?” If so, please describe.

Response: No.

Question 3: Should other changes that are directly or indirectly related to the proposed amendments be made? Please note that the Board will conduct Codification improvements projects on a periodic basis and additional changes may be postponed to a subsequent Codification improvements project.

Response: No. And we believe that postponement is appropriate in this circumstance.