



P.O. Box 4000, Princeton, NJ 08543-4000

Tel 609 252-4000

www.bms.com

January 29, 2018

Technical Director
File Reference No. 2018-200
Financial Accounting Standards Board
401 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116

Re: Proposed Accounting Standards Update: *Leases (Topic 842) Targeted Improvements*

Dear Technical Director:

Thank you for the opportunity to respond to the Exposure Draft *Leases (Topic 842) Targeted Improvements* (hereafter the "Exposure Draft"). Bristol-Myers Squibb Company ("BMS") is a U.S. based Fortune 500 global specialty biopharmaceutical company with total revenues of \$19.4 billion in 2016 and total assets of \$33.7 billion as of December 31, 2016.

We highly support the proposed optional transition method which will reduce the cost and effort in adoption and implementation of ASC 842 *Leases* without sacrificing the quality of financial information provided to financial statement users.

The following are our responses to the questions that are proposed in the Exposure Draft that are relevant to our Company.

Question 1: Would the proposed optional transition method to apply the new lease requirements through a cumulative-effect adjustment in the period of adoption reduce the costs and complexity associated with implementing Topic 842? If not, please explain why.

Yes, we believe the proposed optional transition method will reduce the costs and complexity associated with adopting and implementing ASC 842 *Leases*. We believe that the optional transition method will allow preparers to simplify the transition process by focusing on applying the new lease standard on and after the 1/1/2019 effective date rather than retrospectively recognizing all lease assets and liabilities that exist at the beginning of the earliest comparative period of 1/1/2017 on the balance sheet. We believe that the optional transition method will significantly reduce preparer's efforts as they will no longer have to validate leases which will expire prior to the 1/1/2019 effective date of the new leasing standard. In addition, we fully agree with the FASB that the optional transition method will not sacrifice the consistency in how preparers initially apply the new lease standard but only provides optionality about when preparers initially apply the new lease standard.

Question 2: Is the proposed transition method, as written in this proposed Update, operable? If not, please explain why.

Yes, we believe the proposed transition method is and will actually reduce the overall level of effort and cost for preparers to adopt the new lease accounting standard due to the following:

- Leases which will expire prior to the 1/1/2019 effective date of the new leasing standard will not need to be assessed under accounting guidance in the proposed Exposure Draft.
- Restatement of comparative period financial statements will no longer be required.
- Lease disclosures during the comparative period from 1/1/2017 to 12/31/2018 will no longer be required.

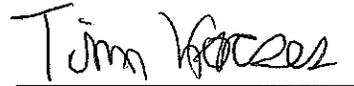
We greatly appreciate your consideration of our comments and invite you to contact us if you have any further questions regarding our above comments on the Exposure Draft.

Sincerely,



Robert Owens

Chief Accountant



Tim Kocses

Director, Corporate Technical Accounting