



Mr. Russell Golden
Chairman
Financial Accounting Standards Board
401 Merritt 7, PO Box 5116
Norwalk, CT 06856

February 1, 2018

**Re: Proposed Accounting Standards Update
File Reference 2018-200**

Submitted via electronic mail to director@fasb.org

Dear Chairman Golden:

The Equipment Leasing and Finance Association (ELFA) is the trade association representing more than 575 financial services companies and manufacturers in the \$1 trillion+ U.S. equipment finance sector. ELFA members are the driving force behind the growth in the commercial equipment leasing and finance market and contribute to capital formation in the U.S. Overall, business investment in equipment and software accounts for 8.0 percent of the GDP; the commercial equipment finance sector contributes about 4.5 percent to the GDP. For more information, please visit <http://www.elfaonline.org>.

We at the ELFA continue to follow developments in lease accounting, including implementation questions raised by our members with respect to *Leases (Topic 842)*. As you know, we have been supportive of the *Leases* project and the approach to lessor and lessee accounting included in the standard. Still, whenever a change in accounting standards occurs, there will always be implementation questions. We understand that many companies are finding the adoption process to be more difficult than anticipated during deliberations. We, therefore, agree with the changes proposed by the Board. They provide a reasonable response to the questions raised to the Board.

In addition, we wish to note that our members are not only lessors and lessees, but also users of financial information whenever they are making credit-investment decisions. As users of financial information, we do not believe that omission of comparative financial statements when the standard is initially adopted represents a meaningful reduction in financial information for the decision-making process.

We appreciate your taking our views into consideration and, as always, stand ready to assist you and the Board on matters of mutual interest.

Sincerely,

A handwritten signature in black ink that reads "Ralph Petta". The signature is written in a cursive style with a long horizontal stroke extending from the end of the name.

Ralph Petta

President/CEO
Equipment Leasing and Finance Association