

Record ID: 637014901629074773

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 *	Moss Adams	
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Is the two-bucket approach described and applied in this Update understandable? If not, please explain why.	It's understandable, but actually implementing the approach takes more time and resources than are readily available for smaller companies.	Completed
Should the population of SEC filers that are afforded a delayed effective date (that is, excluded from bucket one) be entities eligible to be SRCs as defined by the SEC? If not, what definitional threshold, if any, do you suggest and why?	I would agree that those entities should be excluded from bucket one.	Completed
Should the determination of whether an entity is eligible to be an SRC be based on its most recent determination in	The date of the most recently available audited financial statements.	Completed

08/15/2019

<p>accordance with SEC regulations as of the date that a final Update is issued? If not, what determination date should be applied?</p>		
<p>Should Credit Losses be effective for entities eligible to be SRCs, private companies, not-for-profit organizations, and employee benefit plans for fiscal years beginning after December 15, 2022, including interim periods within those fiscal years? If not, please explain why.</p>	<p>Yes</p>	<p>Completed</p>
<p>Should Hedging be effective for all entities other than public business entities for fiscal years beginning after December 15, 2020, and interim periods within fiscal years beginning after December 15, 2021? If not, please explain why.</p>	<p>Yes</p>	<p>Completed</p>
<p>Should Leases be effective for (a) private companies, (b) not-for-profit organizations (excluding those that have issued or are conduit bond obligors for securities that are traded, listed, or quoted on an exchange or an over-the-counter market), and (c) employee benefit plans (excluding</p>	<p>Yes</p>	<p>Completed</p>

08/15/2019

<p>those that file or furnish financial statements with or to the SEC) for fiscal years beginning after December 15, 2020, and interim periods within fiscal years beginning after December 15, 2021? If not, please explain why.</p>		
<p>This question is for future major Updates and not the amendments in this proposed Update. Under the revised effective date philosophy, certain PBEs, including SRCs, and nonpublic business entities would have a deferred effective date. Should interim reporting be required in the same year as the annual financial statements or in the subsequent year for these entities when they provide interim financial statements?</p>	<p>In the subsequent year.</p>	<p>Completed</p>
<p>Please provide any additional comments on the proposed Update:</p>		<p>Completed</p>
<p>Please provide any comments on the electronic feedback process:</p>		<p>Completed</p>