

09/16/2019

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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 *	SVA Certified Public Accountants, S.C.	
First name *	Kelly	
Middle initial		
Last name *	Gustafson	
Email address *	gustafsonk@sva.com	
Phone number		
Is the two-bucket approach described and applied in this Update understandable? If not, please explain why.	Yes.	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?		Completed
Should the determination of whether an entity is eligible to be an SRC be based on its most recent determination in		Completed

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<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. However, for non-SEC registrants that are conduit bond obligors and that have not issued interim financial statements under Leases, the effective date should also be deferred until fiscal years beginning after December 15, 2020, and interim periods within fiscal years beginning after December 15, 2021. It is unlikely these entities have a requirement to issue interim financial statements. These entities are still private companies (and nonprofits) and would benefit from guidance learned from public companies who are implementing the standard in 2019. Surveys of public companies on Leases have indicated more challenges and complexities with the standard than revenue recognition, and allowing more time for these private entities to implement can reduce costs. By continuing to allow early application, it allows any of these entities who have already spent considerable time on implementation the option to move forward as originally planned.</p>	<p>Completed</p>

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<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>The subsequent year.</p>	<p>Completed</p>
<p>Please provide any additional comments on the proposed Update:</p>	<p>I agree with the change in philosophy to stagger the effective dates for major accounting standards updates between public companies and all other entities from 1 year to 2 years or more. The costs associated with implementing new standards can be significant at times, and allowing more time to implement and learn from the experiences of public companies would be beneficial to private companies, especially nonprofit organizations, which often have limited resources.</p> <p>I strongly agree that non-SEC registrant public business entities such as for-profit and nonprofit conduit bond obligors should be included in bucket 2 since these entities are private companies.</p>	<p>Completed</p>

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	<p>With respect to determining effective dates of future major updates, I would recommend the FASB assess and smooth out, to the extent possible, the number of standards that reporting entities need to address within the same year or consecutive years. For example, the new standards relating to revenue recognition and leases affect a large number of reporting entities and were originally slated to have effective dates in consecutive years. Due to the significance and complexities associated with these two standards, it would have been beneficial to all reporting entities (public and non-public) to delay the effective date of leases one more year after revenue recognition.</p>	
<p>Please provide any comments on the electronic feedback process:</p>		<p>Completed</p>