



September 17, 2019

Technical Director, File Reference No. 2019-750
Financial Accounting Standards Board
401 Merritt 7
Norwalk, CT 06856-5116

Re: File Reference No. 2019-750 Exposure Draft – Financial Instruments – Credit Losses (Topic 326),
Derivatives and Hedging (Topic 815), and Leases (Topic 842) – Effective Dates

We are writing on behalf of the Emerging Standards Committee (ESC) of the Kentucky Society of Certified Public Accountants (KyCPA). The KyCPA is the sole professional organization representing CPAs in the Commonwealth of Kentucky. Its 5,100 members are engaged in business communities throughout the Commonwealth and have a comprehensive grassroots view of the needs of businesses, ranging from large public companies to small owner-managed businesses. KyCPA's ESC consists of a group of KyCPA members organized to monitor the activities of accounting and auditing standard setters, with the objective of participating in the standards-setting process by providing thoughtful comment on developing issues.

Our comments for your consideration are as follows:

Overall comments - We agree with and applaud the FASB's efforts to address and mitigate implementation challenges related to new accounting standards. We also agree in principle with the Board's philosophy to identify two "buckets" – bucket one for larger public companies and bucket two for all other entities, which would include private companies, smaller public companies and employee benefit plans.

Questions 1 - 6 – We generally agree with the Board's proposed changes as specified in this proposed ASU and have no additional comments.

Question 7 – We suggest that interim reporting be required for the subsequent year for these "bucket two" entities. We believe this approach would be cost beneficial with little to no negative impact to financial statement users.

Thank you for your consideration.

Sincerely,

Glenn Bradley, CPA, Chair
On behalf of the Emerging Standards Committee
Kentucky Society of CPAs