

Record ID: 637243078397936927

| Question Text | Response | Status |
|---|--|-----------|
| * Please select the type of entity or individual responding to this feedback form. | Preparer | Completed |
| Other, please specify (Specified) | | |
| * Please provide contact information for any follow-up questions. | (Filled in as Follows:) | Completed |
| Organization * | CLA (CliftonLarsonAllen, LLP) | |
| First name * | Donald | |
| Middle initial | L | |
| Last name * | Pfluger | |
| Email address * | don.pfluger@claconnect.com | |
| Phone number | 916-784-7800 | |
| Should the effective date of Revenue be optionally deferred to annual reporting periods beginning after December 15, 2019, and interim reporting periods within annual reporting periods beginning after December 15, 2020, for franchisors that are not public business entities? Please explain why or why not. | We believe that the effective date of Revenue should be deferred for franchisors that are not public business entities. We understand that the application of Revenue to initial franchise fees continues to pose significant challenges for private companies. We also understand that the Board added a research project to its agenda to further explore the issue. Given the uncertainty of the accounting treatment and possible changes as an outcome of the research project, we believe that an additional year delay in adoption of Revenue would be appropriate. | Completed |
| Is the scope of the Revenue deferral (franchisors that are not public business entities) clear? If not, please explain why. | We believe that the scope of the Revenue deferral for franchisors that are not public business entities is clear. | Completed |
| Should Leases be effective for entities in the "all other" | We believe that Leases should be effective for entities in the "all other" category for fiscal years beginning after December 15, 2021, and interim periods within fiscal years | Completed |

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| <p>category (such as private companies and private NFP entities) for fiscal years beginning after December 15, 2021, and interim periods within fiscal years beginning after December 15, 2022? Please explain why or why not.</p> | <p>beginning after December 15, 2022. Many private companies and NFP entities are currently struggling with accounting and operational issues related to the COVID-19 pandemic. Additionally, many private companies look at the implementation of new accounting standards by public companies for guidance. It would be helpful to delay adoption of Leases until the roundtable has been held.</p> | |
| <p>Should Leases be effective for NFP entities 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 that have not yet issued financial statements for fiscal years beginning after December 15, 2019, including interim periods within those fiscal years? Please explain why or why not.</p> | <p>We believe that Leases should be effective for NFP entities that have issued or are conduit bond obligors that have not yet issued financial statements for fiscal years beginning after December 15, 2019, including interim periods within those fiscal years. Many of these entities lack the resources to implement Leases while simultaneously dealing with the COVID-19 pandemic issues; a delay in adoption would be helpful.</p> | <p>Completed</p> |
| <p>Please provide any additional comments on the proposed Update:</p> | <p>none</p> | <p>Completed</p> |
| <p>Please provide any comments on the electronic feedback process:</p> | <p>none</p> | <p>Completed</p> |