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Question Text	Response	Status
* Please select the type of entity or individual responding to this feedback form.	Not Asked	Not Asked
Other, please specify (Specified)		
* Please select the type of entity or individual responding to this feedback form.	Individual	Completed
Other, please specify (Specified)		
* Please provide contact information for any follow-up questions.	(Filled in as Follows:)	Completed
Organization *	N/A	
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<p>Please describe what type of stakeholder you (or your organization) are from the list below, including a discussion of your background and what your point of view is when responding to this ITC:</p> <ul style="list-style-type: none"> a. Academic b. Investor, other allocator of capital, or other financial statement user, such as: <ul style="list-style-type: none"> 1. Equity analyst: buy side 	Individual investor	Completed

<ul style="list-style-type: none"> 2. Equity analyst: sell side 3. Credit-rating agency analyst 4. Fixed-income analyst 5. Accounting analyst 6. Quantitative analyst 7. Portfolio manager 8. Private equity 9. Lender 10. Long/short focus 11. Other <ul style="list-style-type: none"> c. NFP organization preparer d. Practitioner/auditor e. Private company preparer f. Public company preparer g. Regulator h. Standard setter i. Other. 		
<p>Which topics in this ITC should be a top priority for the Board? Please explain your rationale, including the following:</p> <ul style="list-style-type: none"> a. Why there is a pervasive need to change GAAP (for example, what is the reason for the change) b. How the Board should address this topic (that is, the potential project 	<p>The FASB should spend a considerable amount of time looking into changes for US GAAP accounting with respect to the topic of Digital Assets. This topic falls within the broader scope of needing to identify creative ways to properly value not only digital assets, but also intangible assets in an increasingly service-based economy. Each year, the value of book accounting on balance sheets becomes less and less relevant. Internet companies, for example, derive most of their value from earnings that are driven off of intangible, software- or internet-based and human capital. Their balance sheets do not reflect this value and thus analysts are left having to focus on non-GAAP metrics in an increasing manner to bridge the gap between financial reporting and economic value.</p> <p>Digital assets such as Bitcoin, where there is significant transparency around fair value and market pricing, represents the tip of the spear with respect to intangible</p>	<p>Completed</p>

<p>scope, objective, potential solutions, and the expected costs and benefits of those solutions)</p> <p>c. What the urgency is of the Board completing a project on this topic (that is, how quickly the issues need to be addressed).</p>	<p>asset valuation. If we cannot allow issuers to report fair value for holding digital assets like Bitcoin or Ether, how are we planning to make progress within the broader scope of addressing intangible account in general? We have substantial evidence that the purchase and sale of cryptocurrencies in large quantities by institutions does take place, and can be managed such that market impact isn't noticed. If this is the case, we should feel increasingly comfortable with the market price reflecting a true fair value, much like we allow companies to fair value holdings in publicly traded assets, including bonds and equities held for sale.</p> <p>With public issuers focused on cryptocurrencies, including companies that began as cryptocurrency industry service providers, this simple step will go a long way towards addressing the intangible asset accounting divide.</p> <p>I believe the Board should address this within the next year or two, given the prevalence of this trend towards digital assets and the relative simplicity of applying standard fair valuation methods towards digital assets held on a balance sheet.</p>	
<p>Are there topics in this ITC that the Board should not address as part of its future standard-setting efforts? Please explain your rationale, such as there is no pervasive need to change GAAP, the scope would not be identifiable, or the expected benefits of potential solutions would not justify the expected costs.</p>	<p>n/a</p>	<p>Completed</p>
<p>Are there any financial reporting topics beyond those in this ITC that should be a top priority for the Board to address? Please describe:</p> <p>a. The nature of the topic</p> <p>b. The reason</p>	<p>n/a</p>	<p>Completed</p>

<p>for the change</p> <p>c. Whether the topic is specific to a subset of companies, such as public companies, private companies, or NFPs, or specific to a certain industry</p> <p>c. How the Board should address this topic (that is, the potential project scope, objective, potential solutions, and the expected costs and benefits of those solutions)</p> <p>d. What the urgency is of the Board completing a project on this topic (that is, how quickly the issues need to be addressed).</p>		
<p>The objective of this ITC and the related 2021 Agenda Consultation process is to ensure that the FASB continues to allocate its finite resources to standard-setting activities that fulfill its primary mission of improving financial accounting and reporting standards and that are of the highest priority to its stakeholders. Therefore, feedback on the prioritization of projects on the FASB’s technical agenda (see Appendix A) would</p>	<p>The FASB should consider prioritizing any projects that relate to intangible asset accounting as this is a broader macro problem to address an ever growing divide between economic value and financial reporting. The standard disclosures required under US GAAP no longer serve the financial and investment community in an economy increasingly driven by the outsized growth of companies reliant on intangible assets.</p>	<p>Completed</p>

<p>be helpful. Do you have any feedback on the FASB’s technical agenda, including the following:</p> <p>a. Which projects on the FASB’s agenda should the Board prioritize completing? Please explain.</p> <p>b. Which projects, if any, should the Board deprioritize or consider removing from the agenda? Please explain.</p> <p>c. Which projects, if any, need to be redefined to improve the objective and/or scope? Please explain.</p>		
<p>Greater disaggregation and granularity of the types of financial reporting information described in Chapter 1 have been identified as decision useful to investors. The following insights would be helpful to the FASB when considering this area:</p> <p>a. Investors and other financial statement users— Which, if any, of the areas described in Chapter 1 should be a top priority for</p>	<p>n/a</p>	<p>Completed</p>

<p>the FASB to consider requiring greater disaggregation—on the income statement, the statement of cash flows, or the notes to financial statements? Would this information be most useful in the financial statements or in the notes to financial statements? How would this information be used to analyze a company and make capital allocation decisions?</p> <p>b. Preparers—What requests or questions does your company receive from analysts on the areas described within Chapter 1? Please explain any requests or questions your company has received.</p>		
<p>Investors and other financial statement users—What cash flow information, if any, required for your analysis is missing in a statement of cash flows prepared using the indirect method? How would this information influence your decisions and behavior? Please explain.</p>	<p>Better reconciliation between provision for taxes on the income statement and actual cash taxes paid. This tends to be a separate footnote disclosure that could otherwise be incorporated in the statement of cash flows.</p>	<p>Completed</p>

<p>Preparers—What requests or questions, if any, does your company receive from analysts on cash flow information? Please explain.</p>	<p>n/a</p>	<p>Completed</p>
<p>What challenges, if any, are there in applying the guidance on the definition of a derivative and the related derivative scope exceptions in Subtopic 815-10? Please explain the challenges and whether and how they could be addressed through standard setting.</p>	<p>n/a</p>	<p>Completed</p>
<p>Investors—How significant are holdings in digital assets, such as crypto assets, in the companies you analyze? What type of financial reporting information about holdings in digital assets do you use in your analysis of a company? How does that information influence your decisions and behaviors? If there is other financial reporting information about digital assets that would be decision useful, what is that information and why is it decision useful?</p>	<p>The holdings of digital assets in companies that I analyze has now extended into the billions of dollars. The digital asset class has already broached \$2 trillion in total market capitalization, which solidifies its position as a legitimate asset class. Issuers with inventories of digital assets – whether for business use or for investment purposes – should be required to disclose the nominal amount of digital assets held, the current fair market valuation, and the corresponding historical cost. This information is vital towards basic calculations, including net cash/debt positions of a company and thereby its enterprise value. Likewise, it will make it easier to reflect the earnings of a company whose business is rooted in the cryptocurrency industry within the wider context of their digital asset holdings. Otherwise, investors are reliant on private calls with investor relations teams to determine this information, creating unnecessary asymmetry in public market knowledge.</p>	<p>Completed</p>

<p>Preparers and practitioners—Does your company (or companies that you are involved with) hold significant digital assets, such as crypto assets? What is the purpose of those holdings?</p>	<p>n/a</p>	<p>Completed</p>
<p>If the Board were to pursue a project on digital assets, which improvements are most important, what types of digital assets should be included within the scope, and should this guidance apply to other nonfinancial assets?</p>	<p>I believe that the Board should start with an exploration into the application of fair value accounting for digital assets. Thereafter, I would use this momentum to stretch into broader reform of US GAAP accounting with respect to intangible assets, including taking comments on how financial reporting can more closely reflect economic value in the context of software- and internet-based companies (e.g. Facebook, Google, etc.).</p>	<p>Completed</p>
<p>Are there common ESG-related transactions in which there is a lack of clarity or a need to improve the associated accounting requirements? Please describe the specific transactions and why standard setting is needed.</p>	<p>n/a</p>	<p>Completed</p>
<p>Are there common financial KPIs or metrics—either widely applicable to all companies or industry specific—that would provide decision-useful information if they were defined by the FASB? Please</p>	<p>n/a</p>	<p>Completed</p>

<p>explain.</p>		
<p>If the FASB were to define certain financial KPIs or metrics, should all companies be required to provide those metrics or should providing those metrics be optional?</p>	<p>n/a</p>	<p>Completed</p>
<p>If the Board were to pursue a project on the recognition and measurement of government grants, should the FASB leverage an existing grant or contribution model (such as the models in IAS 20 or Subtopic 958-605) or develop a new model? If you prefer leveraging an existing model, which would be most appropriate and why? If the FASB were to develop a new model, what should the model be?</p>	<p>n/a</p>	<p>Completed</p>
<p>The FASB has encountered challenges in identifying a project scope that can be sufficiently described for government grants. If the Board were to pursue a project on the recognition and measurement of government grants, what types of government grants should be</p>	<p>n/a</p>	<p>Completed</p>

<p>included within the scope and why (for example, narrow or broad scope)?</p>		
<p>The FASB has encountered challenges in identifying a project scope that can be sufficiently described for intangible assets. If the Board were to pursue a project on intangible assets, what types of intangible assets should be included within the scope and why? Within that scope, should a project on intangible assets be primarily focused on improvements to recognition and measurement or to disclosure?</p>	<p>Intangible assets can include human capital – understanding the size of employee bases across different operating teams within an organization and the corresponding expenses. Likewise, intangible assets could be valued more regularly without requiring an impairment test, to help investors understand how management teams assess the valuation of their own assets. These valuations can be disclosed as they otherwise would in financial statements for the purpose of sharing information within the context of impairment testing. Oftentimes, management teams use their discretion on reporting this information, in my experience.</p>	<p>Completed</p>
<p>What challenges, if any, exist in applying the capitalization thresholds in Subtopics 350-40 and 985-20? What improvements, if any, could be made to the software capitalization guidance to overcome those challenges? Should there continue to be a capitalization threshold when accounting for software depending on whether it is for internal use or whether it is to be sold, leased, or</p>	<p>I am not well-equipped to answer this question.</p>	<p>Completed</p>

<p>otherwise marketed? Please explain.</p>		
<p>Should the Board prioritize a potential project on current and noncurrent classification of assets and/or liabilities in a classified balance sheet? If yes, what should be the scope? Please explain.</p>	<p>n/a</p>	<p>Completed</p>
<p>Should the Board prioritize a potential project to simplify the consolidation guidance in Topic 810? Please explain why or why not. If yes, should the approach focus on targeted improvements or a holistic review of Topic 810?</p>	<p>n/a</p>	<p>Completed</p>
<p>What challenges, if any, exist in accounting for debt modifications in accordance with the guidance in Subtopic 470-50, Debt—Modifications and Extinguishments? Please explain the challenges and how they could be overcome through standard setting.</p>	<p>n/a</p>	<p>Completed</p>
<p>Stakeholders noted many challenges in applying the liabilities and equity guidance, but they had mixed views on</p>	<p>n/a</p>	<p>Completed</p>

<p>how the Board should improve the accounting for financial instruments with characteristics of equity. The Distinguishing Liabilities from Equity Phase 2 project is intended to align the two existing indexation models in Topic 480 and Subtopic 815-40. Should the Board continue pursuing this project in its current scope and objective, or does the Board need to reevaluate this project? Please explain why or why not and if the project scope and objective need to be reevaluated, what should the approach be?</p>		
<p>How helpful would it be in evaluating disclosure materiality if the materiality guidance in paragraph 105-10-05-06 that “the provisions of the Codification need not be applied to immaterial items” was repeated in the Disclosure Section of each Codification Subtopic? Please explain.</p>	<p>n/a</p>	<p>Completed</p>
<p>Which, if any, of the FASB processes described in</p>	<p>n/a</p>	<p>Completed</p>

<p>Chapter 4 of this ITC could be improved? Please explain your rationale for each, including the following:</p> <ul style="list-style-type: none"> a. Why that process needs improvement b. How the FASB should improve that process c. What the urgency is of that process improvement. 		
<p>Please provide any additional comments on the Invitation to Comment:</p>	<p>n/a</p>	<p>Completed</p>
<p>Please provide any comments on the electronic feedback process:</p>	<p>n/a</p>	<p>Completed</p>