

From: Lawrence de Berry  
To: CommentLetters  
Subject: Enhancing the Financial Accounting and Reporting Standard-Setting Process  
For Private Companies

I concur with those supporting this initiative set forth by the FASB and AICPA. Anyone who has worked for a private company and been confronted with the chore (and cost) of meeting full GAAP compliance will welcome the opportunity to bring some rationality to GAAP requirements as applied to and implemented by private companies. The private company constituent community is different and their level of financial sophistication is different. Most GAAP requirements are appropriate for private companies; some don't fit well. There is a need for these realities to be addressed.

1. Do you believe the proposal contained in paragraphs 16–29 will improve the accounting standard-setting process for private companies? Answer: Yes, the opportunity for private companies and their financial statement constituents to have a voice in determining how GAAP should be applied in the private company world is an idea whose time has come.
2. Specific to paragraphs 16–29 do you believe that the proposed changes will help ensure that the financial reporting needs of constituents of private companies are met? Answer: Yes, as long as they are included in the process, as is the proposal, there is no reason why this cannot be accomplished while improving the applicability of GAAP to private companies.
3. The FASB and the AICPA believe that any differences in generally accepted accounting principles (GAAP) for private companies should be based on financial statement user needs and cost-benefit considerations. Do you agree? Answer: Yes, both are relevant and must be considered.
4. The FASB and the AICPA believe that members of the committee (except the chair) should not be compensated beyond a reasonable reimbursement of expenses. Do you agree? Answer: Yes, to a significant extent service on this committee should be because of commitment to the issues and professional pride. Reasonable out of pocket costs for participation should be covered. Compensation should not be an issue.
5. The FASB and the AICPA believe the committee should set its own agenda and priorities. Do you agree? Answer: Yes, to be effective the committee must have the authority and freedom to set its own agenda and priorities. With appropriate staff support and connection to their constituent bases the committee should be able to appropriately identify and address the most relevant issues.

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