



KPMG LLP
280 Park Avenue
New York, N.Y. 10017
8th Floor

Letter of Comment No: 6
File Reference: FSPFAS143A
Date Received: 4/25/05

April 25, 2005

Mr. Lawrence W. Smith
Director of Technical Application and Implementation Activities
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

Proposed FASB Staff Position No. 143-a, "Accounting for Electronic Equipment Waste Obligations"

Dear Mr. Smith:

We appreciate the opportunity to comment on the exposure draft of the proposed FASB Staff Position No. 143-a, "Accounting for Electronic Equipment Waste Obligations." Based on our understanding of the Directive, we agree that in these specific facts and circumstances producers and distributors should recognize a liability for obligations associated with historical waste held by private households as they generate sales during the measurement period. In addition, we believe it would be helpful for the FSP to address the obligations of producers and distributors for new waste (i.e., products "put on the market" after August 13, 2005).

We also agree with the conclusion in the proposed staff position that for commercial users the obligation associated with historical waste held by the commercial users is an asset retirement obligation that should be accounted for pursuant to FASB Statement No. 143, *Accounting for Asset Retirement Obligations*, and FASB Interpretation No. 47, *Accounting for Conditional Asset Retirement Obligations*.

* * * * *

If you have questions about our comments or wish to discuss any of the matters addressed herein, please contact Mark Bielstein at (212) 909-5419 or Paul Munter at (212) 909-5567.

Very truly yours,

KPMG LLP