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Technical Director  
File Reference No. **1300-001**  
Financial Accounting Standards Board  
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Letter of Comment No: **2**  
File Reference: **1300-001**  
Date Received: **5-10-05**

May 10, 2005

Dear Director:

This responds to the Exposure Draft, The Hierarchy of Generally Accepted Accounting Principles dated April 28, 2005.

Although you state that this standard does not change the existing hierarchy or change practice, I believe it does make at least one change and that change is one I believe to be unnecessary. I am referring to the inclusion of FASB Staff Opinions in the highest level of GAAP.

Let me explain. Several years ago when I was a member of FASAC, I expressed my concern over the proliferation of "staff announcements" at meetings of the Emerging Issues Task Force, made by both the SEC staff and the FASB staff. I asked the then Research Director where such announcements fit into the existing hierarchy and equally important, how could they be easily retrieved. He did not have a ready answer at the time and I have never since seen anything that states the place for such announcements.

Secondly, I believe giving such announcements a place in the literature or hierarchy is completely unnecessary. Since its inception the FASB has had the ability to issue Technical Bulletins which I suggest accomplish the same purpose as staff announcements. Technical Bulletins have the added benefit of already existing in the hierarchy as well as having an existing numbering system and retrievability.

You state in the Exposure Draft that FASB Staff Positions are subject to due process but if they are, I am unaware of the process. It is also not clear why such Staff Positions are given higher rank than Technical Bulletins in the proposed hierarchy. I would urge the Board to simply eliminate this unneeded and extra method of providing views and incorporate such views in Technical Bulletins.

I wish to state that the views in this letter are my personal views and do not represent those of any organization that I represent.

Yours truly,

Frank C. Minter