## Stacev Sutav

Letter of Comment No: 23
File Reference: 1082-300

Date Received: 11/12/03

From: amerleak@msn.com

Sent: Wednesday, November 12, 2003 3:12 PM

To: Director - FASB

Cc: john@franchise.org

Subject: FIN 46 File Reference No. 1082-300

As an independent owner and operator of a franchisee, I am concerned about the clarification of the proposed FIN 46 as it relates to franchisor and franchisee relationships. The requirement of small franchisees like myself to provide audited and consolidated financial statements would be so costly that most franchisees could not afford to stay in business.

I think that the implementation of FIN 46 should be delayed until this issue is clear as it relates to franchisors and franchisees.

I support better financial reporting requirements by businesses involved with VIE's but I do not think it is your intention to put franchisees in this category.

Sincerely, Russell L. Lee American Leak Detection of Southwest Florida