



Letter of Comment No: 16
File Reference: 1082-300
Date Received: 11/07/03

TA & I Director
Financial Accounting Standards Board
401 Merritt 7
PO Box 5116 Norwalk CT, 06856

November 7, 2003

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I'm Writing to express my concern for the proposed implementation of FIN 46. First let me explain that Wireless Toyz is a small franchise organization that offers business opportunities in the retail cellular field.

The draft as it is written would create a substantial amount of additional expense for my growing organization. This additional cost will hinder our ability to continue to expand our concept and reduce the opportunity to create additional jobs in the communities that we open franchise locations. This additional expense would also have to be passed on to our franchise network in the form of higher fees from the franchiser.

This will also have a domino effect as our franchisees will now need to pay additional expense and man hours to create the additional information necessary to comply with this ruling.

I think it is important to carefully review the requirements of FIN 46 and compare it to the cost necessary to achieve compliance. I do not believe that the additional cost that will be bore by so many small companies justifies the end result that you are trying to achieve.

Sincerely

David D. Ebner
Chief Financial Officer
Wireless Toyz.
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