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Financial Accounting Standards Board 401 Merritt 7 P.O. Box 5116 Norwalk, CT 06856-5116

RE: New Agenda Proposals

While I have included my opinions on the proposed projects in the recent FASAC survey, and look forward to the upcoming FASAC discussion, I thought it might be useful to express them in direct fashion. Briefly, I think neither project should be pursued. The "financial performance" proposal presumes there is some underlying best or at least reasonable approach to assessing financial performance. Yet the underlying economics and empirical work are overwhelmingly consistent with just the opposite presumption. Today's "key measures" and unlikely to be tomorrow's "key measures," and there is likewise no reason to suspect "key measures" are stable across industries.

The "intangible assets disclosure" proposal has, as a stated objective, a goal of making new information available. Yet we lack analysis of what this information might be, relative to alternate sources of information in the economy; and in addition we lack analysis of why any existing information is best repackaged in the financial reporting structure or why any new information is both not now produced and best produced and presented within the financial reporting structure.

These specific concerns are magnified by the opportunity cost of devoting the Board's resources to these projects, in particular work on more broad based projects such as recognition in general.

Sincerely,