



ABBOTT

Abbott Laboratories
One Abbott Park Road
Abbott Park, Illinois 60064-3500

November 30, 1995

Letter of Comment No.	<u>11</u>
File Reference	<u>1082-154</u>
Date Received	<u>12/12/95</u>

Director of Research and Technical Activities
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, Connecticut 06856-5116

Re: **File Reference No. 154-D**

Dear Sir:

Abbott Laboratories is a \$9 billion worldwide company engaged in the discovery, development, manufacture and sale of human health care products. The company has 50,000 employees worldwide. Abbott's market capitalization is \$32 billion with about 800 million shares outstanding. We are listed on the New York Stock Exchange.

We are pleased to respond to the Exposure Draft, "Consolidated Financial Statements: Policy and Procedures" and have the following comments.

We do not believe that parent and subsidiaries should be required to have the same fiscal period. Abbott has foreign subsidiaries in approximately 130 countries with fiscal periods one month earlier than the parent. Our year-end public earnings releases are generally 13 to 14 business days after the end of the parent's fiscal period. Our quarter-end earnings releases are generally six business days after quarter-end. In order to conform the fiscal periods, a significant delay in the earnings releases would occur. We believe that this would not be acceptable to our shareholders. Therefore, we believe that the latitude, under ARB 51, that allows financial information of a subsidiary to differ from the fiscal period of the parent should be retained as long as this difference does not create misleading financial statements.

Regarding reporting of noncontrolling interest in subsidiaries, we believe that the disclosure of net income attributable to the noncontrolling interest is not meaningful. Shareholders of the company are interested only in the net income of the company that they own. In addition, the net income attributable to the noncontrolling interest often would be attributable to many noncontrolling interests and, therefore, would rarely be meaningful.

Sincerely,

Theodore A. Olson
Vice President and Controller