Letter of Comment No: 444
File Reference: 1082-154
Date Received: / José

January 8, 1996

Financial Accounting Standard Board File Reference 154-D 401 Merritt 7 P. O. Box 5116 Norwalk, CT 06856-5116

Re: Consolidated Financial Statements-Policy & Procedures No. 154-D

## Gentlemen:

The authority and relationship of the Archdiocese of Cincinnati and the 230 congregations that constitute that Archdiocese are governed by church Canon law, and Ohio civil law.

Under Canon law, the congregations are Juridic Persons. As such, they enjoy responsibilities and rights that do not resolve to the categories that are used by the above referenced proposal. In fact, the spirit of the **exception** noted in paragraph 171, page 60, of the draft express the practical relationships in our Archdiocese.

Therefore, by this letter we support the exception noted in paragraph 171, and would expect to continue to exclude the financial activities of our external congregations from any subsequent audited statement of the Archdiocese. We cannot control these congregations sufficiently to meet the tests set forth in this draft as evidence for control.

If you have any questions about this matter, please contact me.

Sincerely yours,

Howard P. Pecquet

Treasurer

CC: Mr. Steven Lameier

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Archdiocese of Cincinnati

Department of Financial Services 100 East Eighth Street Cincinnati, Ohio 45202 513/421-3131