



FASB Staff Position SOP 94-3-a and AAG HCO-a

November 30, 2007

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File Reference: Proposed FSP SOP 94-3-a and AAG HCO-a

The Not-for-Profit Committee of the Illinois CPA Society (Committee) appreciates the opportunity to provide our perspective on the Exposure Draft of a Proposed FASB Staff Position (FSP), Omnibus Changes to Consolidation and Equity Method Guidance for Not-for-Profit Organizations. The organization and operating procedures of the Committee are reflected in the attached Appendix A to this letter. These recommendations and comments represent the position of the Illinois CPA Society rather than any members of the Committee or of the organizations with which the members are associated.

Our comments in response to the questions raised in the document are as follows:

Retrospective Application

TE Breeze

Question 1 – In general, we support and agree with the objectives of the proposed FSP. We do not foresee any significant impediments to implementing the provisions of this FSP retrospectively as required by paragraph 19.

Simplification of Consolidation Guidance

Question 2 — We are not aware of any instances in which control through a majority ownership interest by other than ownership of a majority voting interests exists. In general, we do not believe this provision is widely used in practice.

We appreciate the opportunity to offer our comments.

Sincerely,

John Hepp

Tom Brean, CPA
Chair, Not-for-Profit Committee

John Hepp, CPA
Chair, Accounting Principles

APPENDIX A ILLINOIS CPA SOCIETY ACCOUNTING PRINCIPLES COMMITTEE ORGANIZATION AND OPERATING PROCEDURES

2007-2008

The Accounting Principles Committee of the Illinois CPA Society (Committee) is composed of the following technically qualified, experienced members appointed from industry, education and public accounting. These members have Committee service ranging from newly appointed to more than 20 years. The Committee is an appointed senior technical committee of the Society and has been delegated the authority to issue written positions representing the Society on matters regarding the setting of accounting standards. The Committee's comments reflect solely the views of the Committee, and do not purport to represent the views of their business affiliations.

The Committee usually operates by assigning Subcommittees of its members to study and discuss fully exposure documents proposing additions to or revisions of accounting standards. The Subcommittee ordinarily develops a proposed response that is considered, discussed and voted on by the full Committee. Support by the full Committee then results in the issuance of a formal response, which at times, includes a minority viewpoint.

Current members of the Committee and their business affiliations are as follows:

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Large: (national & regional)

John A. Hepp, CPA

Alvin W. Herbert, Jr., CPA

Steven C. Johnson, CPA

Matthew G. Mitzen, CPA

Laura T. Naddy, CPA

Reva B. Steinberg, CPA

Jeffery P. Watson, CPA

Medium: (more than 40 employees)

Barbara Dennison, CPA

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Retired/Clifton Gunderson LLP

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Ostrow, Reisin, Berk & Abrams, Ltd.

Walter J. Jagiello, CPA

Benham, Ichen & Knox LLP

Cabot Microelectronics

The Boeing Co.

TTX Company

McDonald's Corporation

University of Notre Dame

Ohio University

University of Chicago

Illinois CPA Society

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