We appreciate the opportunity to provide constituent input to the AICPA/FAF/NASBA Blue Ribbon Panel regarding how accounting standards can best meet the needs of U. S. users of private company financial statements.

1. Please complete the form to help compile information on the respondents and send as a separate attachment.

The requested form is completed and attached.

2. *Users (e.g., lender, surety, investor, owner) only:* Not applicable

3. a) Tell us about any issues or concerns you have with current U.S. GAAP accounting standards as those standards apply to private company financial statements.

We believe the goal of providing relevant, useful and reliable financial information has been obscured by a number of pronouncements in recent years. A number of the pronouncements appear to be issued with broad consequences in response to more narrow, high-profile events. The avalanche of standards applicable to virtually all organizations is burying many with costs and time burdens not deemed as adding value by those organizations or their stakeholders. In fact, a number of those organizations and stakeholders appear more frustrated and confused than at any other point in recent history.

We acknowledge that the Private Company Financial Reporting Committee formation was a positive step and that there has been some level of consideration and relief for non-issuers. However, we also believe that more relief was and is warranted. The recognition of varying stakeholder needs is not being achieved by a single standard setting board and advisory committee, despite private company representation and input. In the current regulatory climate, the demands and expectations are simply too diverse between many issuers and non-issuers.

A super majority of U. S companies by number are private. Many of those entities are non-speculative core businesses unmotivated by fair value swings or spikes. Yet, those businesses are faced with the burden of reporting or explaining temporary changes or timing differences not directly affecting their core business or business decisions.

b) Are those issues or concerns confined to one or more specific standards, or are they more systemic?

The issues and concerns are now systemic based on the standards avalanche of recent years. Fair value measurement, reporting and disclosure may be a central theme, but other standards modifications seemingly based on the needs of large, diverse shareholder groups have resulted in numerous challenges for smaller, closely-held companies.

c) Do you believe that those issues or concerns are largely confined to private companies, or are they broader?

As discussed above, numerous standards may have greater relevance to issuers based on business complexity and shareholder/potential investor demographics, expectations and views.

While the issues and concerns may not be confined to private companies, we certainly believe that the impact on private companies is disproportionately burdensome.

4. What short-term and/or long-term actions do you believe are necessary to address those issues or concerns? Please be as specific as possible in your answer, and explain your reasoning.

The Board has been reluctant to scope out the private companies or companies under an identified financial threshold based on assets or revenue apparently with a view that consistency for all reporting entities is most important. We do not believe that the consistency criterion is most relevant for reasons articulated in answering question 3 above. Other countries and the IASB have reached conclusions that variance in applicability of individual standards are justified. If a single standard setting board cannot justify varying applicability in regards to individual standards, then a separate board for private company standards should be given serious and thoughtful consideration.

5. a) To what extent, if any, would an SEC requirement for public companies to adopt IFRS at a date certain affect your answers above? Why?

The concerns expressed above exist regarding U.S. GAAP as it currently stands, as well as IFRS due to the convergence initiative. Various countries have labeled their standards as IFRS, yet they have country specific variances of IFRS thereby diminishing the conceptual value of a single international standards platform. Therefore, our belief in the need for private company relief exists with or without an SEC adoption date.

b) To what extent, if any, would other outside factors affect your answers above? Which factors and why?

None identified at this time.

6. Is there any other input that you'd like to convey to the Panel?

While a thoughtful, measured conclusion regarding U.S. accounting standard setting is essential, material financial resources as well as significant leadership and personnel time are being consumed with the broad application of accounting standards of questionable value to private companies and their stakeholders. The need for timeliness in resolving private company standard setting leadership and applicability cannot be overstated.

7. Do these responses represent your individual views or are they submitted to represent the views of the organization with which you are associated?

These responses represent the views of our firm.