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EITF-12B  
Comment Letter No. 10  
233 N. Michigan Ave., Suite 2500  
Chicago, IL 60601

September 20, 2012

Via email to [director@fasb.org](mailto:director@fasb.org)

Susan M. Cospers  
Technical Director  
Financial Accounting Standards Board  
401 Merritt 7  
PO Box 5116  
Norwalk, CT 06856-5116

RE: Proposed Accounting Standards Update, *Not-for-Profit Entities: Personnel Services Received from an Affiliate for Which the Affiliate Does Not Seek Compensation* (File Reference No. EITF 12B)

Dear Ms. Cospers:

We are pleased to provide our comments on the exposure draft related to EITF Issue No. 12B. We support the exposure draft as proposed, with one exception. With respect to transition, we prefer retrospective adoption for all periods presented to enhance comparability. We note that the amounts in prior years should be available in most cases, and that Topic 250<sup>1</sup> already provides relief if retrospective adoption is impracticable. In addition, we do not anticipate any significant implementation challenges, and recommend an effective date for periods ending after December 31, 2012.

As it relates to measurement, we believe that reflecting the cost of the services received is appropriate, which includes all direct personnel costs. We agree with the Task Force that a fair value measurement attribute would add unnecessary complexity and implementation challenges for not-for-profit entities.

We would be pleased to discuss our comments with the FASB staff. Please direct questions to Lee Graul, National Director of Accounting at (312) 616-4667 or Adam Brown, Partner in the National Accounting Department at (214) 665-0673.

Very truly yours,

BDO USA, LLP

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<sup>1</sup> *Accounting Changes and Error Corrections*