





Technical Director  
May 30, 2013  
Page 3 of 3

*Question 24 – How much time would be needed to implement the proposed guidance? What type of system and process changes would be necessary to implement the proposed guidance.*

We would need at least one year to implement the proposed guidance, reflecting our efforts to collect historical data, particularly where none is available, and develop a reasonable, supportable and auditable approach to estimating credit losses. Our biggest challenge would be to develop a method for calculating the allowance for expected credit losses for our current accounts receivable, where our risk of loss has historically been minimal. Under the Proposal, we would be required to incorporate a supportable risk of credit loss for *all* of these receivables, which would be a significant process change as we currently use specific identification to calculate reserves for the few receivables we have difficulty collecting.

Thank you for the opportunity to provide comments on the Proposal. We would be pleased to discuss our views with you at your convenience.

Sincerely,



Carl T. Berquist  
Executive Vice President and  
Chief Financial Officer