From: Beverley Rutherford [mailto:beverley.rutherford@vacu.org]

Sent: Friday, June 14, 2013 3:55 PM

To: Director - FASB

Subject: File Reference No. 2013-250

Private Company Decision-Making Framework—A Guide for Evaluating Financial Accounting and Reporting for Private Companies

Thank you for the opportunity to comment on the above referenced exposure document. I am responding on behalf of the largest state-chartered credit union located in Virginia with over \$2.4 billion in assets, and serving over 220,000 members.

Our comments are as follows:

- 1. We agree that the differential factors listed between public and private are reasonable. We would also suggest that complexity of operations may play a role as well. We do not think that any of these should disqualify a company but simply be another consideration.
- 2. We think the flexibility for a company to pick and choose alternatives is extremely important. Without that, the practicality of even having this option is severely diminished. There certainly could be appropriate circumstances where application of alternatives is linked, but those should be kept to a minimum. We need to remember the types of businesses that will be using this framework and strive to keep it as simple as possible. It also needs to be made clear whether a choice to use the private company alternative is "permanent" and what is involved in changing between public company GAAP and private company.
- 3. Private companies should not be required to follow the same industry specific guidance. This defeats the whole purpose of simplifying the rules for private companies. In many instances, it is the industry specific guidance that is causing challenges and issues (for example, loan loss disclosures two years ago). We are concerned that if this is up to FASB to designate within each rule, that FASB will always opt for all companies following the same public company standards. Private companies need more flexibility. Cost and complexity must be a consideration. If the additional information is not value-added, private companies should not have to prepare it.
- 4. A key factor here is how much audited financial statements are actually used for decision making in private companies. Most decisions at these types of companies occur with internal, supplemental information not at the very late date of the issuance of audited financials. The purpose of audited financial statements for many companies is to add credibility. If the intricacies and complexities of the financial statement requirements do not add decision making value, they do not help add to that credibility. They merely add unneeded cost and complexity.
- 5. According to the current definition, credit unions appear eligible to follow the private company framework. We would like to make sure this eligibility continues and such financial institutions are not eliminated in some manner by a future change.

Thank you for considering our comments. Please feel free to contact me should you need clarification on our response.

Beverley F Rutherford, CIA, CUCE VP/Compliance Virginia Credit Union Richmond, VA 23225 804.560.5665 beverley.rutherford@vacu.org

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