



September 3, 2013

Mr. Russell G. Golden
Chairman
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856

Mr. Hans Hoogervorst
Chairman
International Accounting Standards Board
30 Cannon Street
London, EC4M6XH
United Kingdom

Dear sirs,

As a 25 year leasing professional, I am astounded as to both the time and energy going into the proposed FASB rules to match up with International Accounting Standards. Where I understand the basic logic of having US Corporations use similar accounting logic in an increasingly competitive global environment, I do not see the basis for domestic only business to convert under the proposed plan.

There are thousands of hospitals that have basic debt to equity ratios and limitations with their banks. Forcing them to capitalize their leases that were largely written in good faith to hedge against equipment obsolescence would saddle both small and large institutions with costs and certainly debt ratio violations just so you can standardize and archaic language.

A more pragmatic solution would be to set standards that must be met, and allow for ALL transactions occurring before the proposed date to be grandfathered in. Another solution is simply to have all operating leases thrown on the balance sheet with notations. This is mostly done already.

A change of this magnitude with benefit bankers and accountants, just to simply match up already easily decipherable accounting discrepancies internationally.

I encourage you to re-think your approach and gain more customer input before you impose any changes.

Thanks in advance for reading my thoughts.

Sincerely,

Bob Dillman
Regional Vice President
First Financial Healthcare Solutions
2070 Fairhaven Ave.
Bellingham, WA 98229