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September 12, 2013

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

Mr. Hans Hoogervorst, Chairman International Accounting Standards Board 30 Cannon Street London EC4M 6XH United Kingdom

Re: Leases – Topic 842 Proposed Accounting Standards Update (Revised), Issued: May 16, 2013

Dear Chairman Golden and Chairman Hoogervorst:

Thank you for the opportunity to respond to the Lease Exposure Draft ("ED"). We would like to provide some additional insights concerning the transition from the current standards to any new standards, if/when put forth.

IDS is a leading provider of asset finance, origination, and portfolio management software solutions. For over 30 years, IDS has offered the broadest range of functionality, with systems designed to manage all contract and asset management activities including origination and booking, accounting and end-of-term disposition. IDS serves over 250 customers, across 34 countries and our clients include a number of the world's largest financial services institutions.

As a software and service provider to the asset finance industry, we think it is crucial that any change in standards be accompanied by a transition period that reflects the significance of the changes. Therefore, we would like to respond in part to Question 7: Transition as it relates to the asset finance industry. The question restated below is:

Subparagraphs 842-10-65-1(b) through (h) and (k) through (y) state that a lessee and a lessor would recognize and measure leases at the beginning of the earliest period presented using either a modified retrospective approach or a full retrospective approach. Do you agree with those proposals? Why or why not? If not, what transition requirements do you propose and why? Are there any additional transition issues the Boards should consider? If yes, what are they and why?

However, regardless of the final approach, we believe an extended amount of time will be required for the following tasks to be completed:

- Once the new standards are finalized and issued, the Lessors will need to review and map the new standards to their business.
- Lessors and their software and service providers will need to identify the
 potential business impacts of the new standards, including those which
 require system modifications, including software development efforts.
- Any required system modifications, whether for internal or market delivered systems, in order to satisfy regulatory muster must follow a software development lifecycle process for use by the Lessor and the industry.
- Simultaneously, Lessors will be assessing changes driven by the new standards through the Lessors' business model(s) in the following areas: a) business processes, b) product offerings, c) pricing, d) lease documents and e) reporting.
- Lessors will need to complete full lifecycle user acceptance testing of system modifications and new business processes.
- Allow Lessors to monitor comparable outcomes and allow any resulting changes to be incorporated into the systems or business process as appropriate.
- Allow Lessors electing to transition using multiple book sets to have any necessary system modifications in place for the entire comparable period.
- Allow any public Lessor required to derecognize an asset or liability and make a corresponding adjustment to equity with a resulting restatement back to the earliest comparable period presented.

We have responded to question 7 of the ED because we anticipate that the new standards will require a relatively small set of service providers to meet this high demand over a relatively short period of time once the standards are finalized. We felt compelled to respond to ensure that both Boards were aware of the potentially lengthy timeline required to ensure a successful and smooth transition.

Again, thank you for the opportunity to provide our comments to the latest version of the Exposure Draft.

Sincerely yours,

John D. Emerick,

Chief Financial Officer

International Decision Systems, Inc.