

Sept. 24, 2013

Technical Director
File Reference No. 2013-300
401 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116

Submitted via email to director@fasb.org

Re: Disclosure of Uncertainties about an Entity's Going Concern Presumption

Dear Technical Director:

On behalf of the 11,000 members of the Virginia Society of CPAs (VSCPA), we have reviewed the proposed *Exposure Draft: Presentation of Financial Statements (Topic 205): Disclosures of Uncertainties about an Entity's Going Concem Presumption* issued by the Financial Accounting Standards Board (FASB). The VSCPA is a leading professional association dedicated to enhancing the success of all CPAs and their profession by communicating information and vision, promoting professionalism, and advocating members' interests. The VSCPA membership consists of more than 11,000 individual members who actively work in public accounting, private industry, government and education. We appreciate the work the FASB has undertaken on this effort and the opportunity to respond to this Exposure Draft.

We support the FASB's efforts to provide guidance on an entity's responsibility to disclose uncertainties about its ability to continue as a going concern and believe the FASB has developed appropriate guidance.

We agree that the Exposure Draft addresses an area where guidance is needed. As mentioned in the Exposure Draft, there currently is no guidance on when and how going concern uncertainties should be disclosed in an entity's financial statements. We believe the proposed update provides appropriate guidance to preparers of financial statements on when and how disclosure is required, and we believe that management should be able to objectively make the related evaluations as it would for other financial statement disclosures. This update will also be helpful to auditors by providing clear guidance on when the reporting entity should make disclosures regarding going concern uncertainties. We believe the proposed update will provide consistency to reporting on going concern uncertainties and, as a result, improve the effectiveness of financial reporting.

In our view, the timeframes of 12 months for situations where it is more likely than not that the entity will be unable to meet its obligations and 24 months when it is known or probable that the entity will be unable to meet its obligations are both reasonable.

Overall, we believe the changes will provide helpful guidance on disclosures required when uncertainty exists regarding an entity's ability to continue as a going concern.

Again, the VSCPA appreciates the opportunity to respond to this Exposure Draft. Please direct any questions or concerns to VSCPA Government Affairs Director Emily Walker at <a href="mailto:ewalker@vscpa.com">ewalker@vscpa.com</a> or (804) 612-9428.

Sincerely,

Michael Wagner, CPA, CGFM Chair

Miletel

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