

October 19, 2017

Ms. Susan M. Cospers
Technical Director
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

By e-mail: director@fasb.org

Re: Proposed Accounting Standards Update—Leases (Topic 842): Land Easement Practical Expedient for Transition to Topic 842

(File Reference No. 2017-290)

Dear Ms. Cospers:

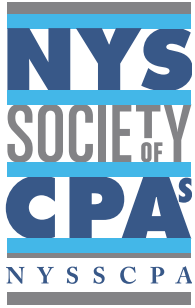
The New York State Society of Certified Public Accountants (NYSSCPA), representing more than 26,000 CPAs in public practice, business, government and education, welcomes the opportunity to comment on the above-captioned exposure draft.

The NYSSCPA's Financial Accounting Standards Committee deliberated the proposed accounting standards update and prepared the attached comments. If you would like additional discussion with us, please contact Margaret A. Wood, Chair of the Financial Accounting Standards Committee, at (201) 401-7844, or Ernest J. Markezin, NYSSCPA staff, at (212) 719-8303.

Sincerely,

Harold L. Deiters III
President

Attachment



**NEW YORK STATE SOCIETY OF
CERTIFIED PUBLIC ACCOUNTANTS**

**COMMENTS ON
PROPOSED ACCOUNTING STANDARDS UPDATE—*LEASES (TOPIC 842): LAND
EASEMENT PRACTICAL EXPEDIENT FOR TRANSITION TO TOPIC 842***

(File Reference No. 2017-290)

October 19, 2017

Principal Drafter

Margaret A. Wood

NYSSCPA 2017–2018 Board of Directors

Harold L. Deiters III, <i>President</i>	Dennis N. Annarumma Edward L. Arcara	Patricia A. Johnson Kimberly G. Johnson
Jan C. Herringer, <i>President-elect</i>	Sol S. Basilyan Christopher G. Cahill	Barbara A. Marino Tracey J. Niemotko
Anthony T. Abboud, <i>Secretary/Treasurer</i>	Jack M. Carr Anthony S. Chan	Kevin P. O’Leary Thomas S. Pirro
Paul E. Becht, <i>Vice President</i>	Salvatore A. Collemi Mitchell A. Davis	Iralma Pozo Renee Rampulla
John B. Huttlinger, Jr. <i>Vice President</i>	William H. Dresnack Edward F. Esposito	Brian M. Reese Steven A. Stanek
Mitchell J. Mertz, <i>Vice President</i>	Mark L. Farber Lynne M. Fuentes	Denise M. Stefano Janeen F. Sutryk
Candice R. Meth, <i>Vice President</i>	Jennifer R. George Craig T. Goodman	Michael M. Todres Mark M. Ulrich
Joanne S. Barry, <i>ex officio</i>	Elliot L. Hendler Douglas L. Hoffman	F. Michael Zovistoski

NYSSCPA 2017–2018 Accounting and Auditing Oversight Committee

Robert M. Rollmann, <i>Chair</i>	Craig T. Goodman	Joseph J. Puglisi
Renee Mikalopas-Cassidy, <i>Vice Chair</i>	Jan C. Herringer	Dominic J. Rovano
Charles Abraham	J. Michael Kirkland	William M. Stocker III
Michael J. Corkery	Rita M. Piazza	Margaret A. Wood
	Victoria L. Pitkin	

NYSSCPA 2017–2018 Financial Accounting Standards Committee

Margaret A. Wood, <i>Chair</i>	Craig T. Goodman	John J. McEnerney
Agwu Agwu	Abraham E. Haspel	Joseph Montero
Brian M. Aledort	Orume A. Hays	Lingyun Ou
Olga Bashkatova	Jean-Pierre Henderson	Pedro D. Pile
Christina K. Catalina	Edward P. Ichart	Richard M. Posen
Ramona Cedeno	Tamar Kadosh	Laura C. Prevratil
Muneeb Danish	Min Jung Kang	Renee Rampulla
Timothy P. Demetres	Michael D. Kasperski	Viktoriya Riggs
J. Roger Donohue	Angela V. Katehis	Robert M. Rollmann
Deepak K. Doshi	Ira G. Kawaller	Troy P. Segar
Robert A. Dyson	Jeffrey A. Keene	Ahmed Shaik
William Epstein	Mueed Kumandan	Daniel Shea
Roseanne T. Farley	Young Kwon	Mark Springer
Sharon Sabba Fierstein	Kevin Lee	A’Isha Torrence
Christopher Gagliardi	Joseph A. Maffia	Joshua D. Verni
Jo Ann Golden	Nigyar Mamedova	Rosemarie E. Whyte
Fred R. Goldstein	Sean Martell	Yan Zhang
	Sean D. Matthews	

NYSSCPA Staff

Ernest J. Markezin

New York State Society of Certified Public Accountants

Comments on

Proposed Accounting Standards Update—*Leases (Topic 842): Land Easement Practical Expedient for Transition to Topic 842*

(File Reference No. 2017-290)

General Comments

We welcome the opportunity to respond to the Financial Accounting Standards Board's (FASB or the Board) invitation to comment on the Proposed Accounting Standards Update—*Leases (Topic 842): Land Easement Practical Expedient for Transition to Topic 842* (proposed Update).

We agree with the Board's proposal to provide clarification that land easements are to be assessed using Topic 842 Leases. This will eliminate the current differences that occur in GAAP. We also agree with the Board's proposal to provide relief to and permit prospective adoption of Topic 842 for the accounting for land easements for those companies that did not use Topic 840 Leases to assess land easements in the past.

Specific Comments

We have the following responses to questions posed in the proposed Update.

Question 1: Would the land easement practical expedient in this proposed Update reduce the cost and complexity to implement Topic 842? If not, please explain why.

Response: We agree that the land easement practical expedient in this proposed Update should reduce the cost and complexity to implementing Topic 842 as it relates to land easements.

Question 2: Would the proposed amendments require transition provisions or an effective date that is different from those for Topic 842? If yes, please explain what transition requirements and/or effective date you would recommend and why.

Response: The transition provisions and effective date should be the same as Topic 842.