

Ronald G. Pippin
Director
Financial Accounting
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May 24, 1999

Mr. Timothy S. Lucas
Director of Research and Technical Activities
Financial Accounting Standards Boar
401 Merritt 7
Norwalk, CT 06856-5116

Re: File Reference No. 194-B

Dear Mr. Lucas,

Letter of Comment No: 40
File Reference: 1082-194R
Date Received: 62/166

Ameritech Corporation is pleased to participate in the Board's standard setting process by offering our comments on the proposed statement of financial accounting standards entitled "Consolidated Financial Statements: Purpose and Policy" (ED). We are a communications company with revenues over seventeen (17) billion dollars and assets of thirty (30) billion dollars.

Generally, we concur with the accounting requirements prescribed in the ED. In particular, Ameritech agrees that the proposed Statement adequately defines control and temporary control and provides a solid base to operationalize such definitions. However, we would like to stress the importance of providing sufficient guidance. That is, we believe any additional relevant real-life examples presented to the Board during the due-process review should be incorporated in the final statement. The inclusion of these additional examples will enhance the existing guidance, and should help to minimize interpretation/implementation issues.

We appreciate the opportunity to express our views pertaining to this proposed Statement of Financial Accounting Standards.

Sincérely

Ronald G. Pippin