

FLORIDA INSTITUTE OF CERTIFIED PUBLIC ACCOUNTANTS

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January 25, 2007



LETTER OF COMMENT NO. 19



Financial Accounting Standards Board 401 Merritt 7 P.O. Box 511C Norwalk, Connecticut 06856-5116

Attention:

Technical Director - File Reference 1500-100

Via e-mail:

director@fasb.org

RE: Proposed Statement of Financial Accounting Standards: Not-for-Profit Organizations: Mergers and Acquisitions

The Accounting Principles and Auditing Standards Committee of the Florida Institute of Certified Public Accountants (the Committee) has reviewed and discussed the above referenced proposed financial accounting standard. The Committee has the following comments, as well as responses to the questions within the proposed standard:

Questions 1 through 8

The Committee is in agreement with the questions asked in numbers 1 through 8.

Question 9

The Committee believes that grant contractual agreements which are prevalent in Not-For-Profit Organizations be included as an example in Appendix A.

Questions 10-15 and 17

The Committee is in agreement with the questions asked in numbers 10-15 and 17.

Question 16

The Committee believes that although the guidance provided in the standard is necessary and helpful, there are situations when noncontrolling ownership interests could be prevalent.

Question 18

The Committee believes that there will be significant evaluation costs associated with the implementation of this standard and that it should only be applied to large Not-For-Profit Organizations. However, the Committee does believe that this new standard will provide users more reliable information concerning the cost and valuation of the merged or acquired organization.

The Committee appreciates this opportunity to share our views and concerns. Members of the Committee are available to discuss any questions you may have regarding this communication.

Sincerely,

Helen Painter, CPA, Chair FICPA Accounting Principles and Auditing Standards Committee

Committee members coordinating this response: Troy Manning