

May 8, 2009

LETTER OF COMMENT NO. 20

Mr. Russell G. Golden
Director of Technical Application and Implementation Activities
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

Proposed Statement of Financial Accounting Standards, The Hierarchy of Generally Accepted Accounting Principles, a replacement of FASB No. 162 (File Reference No. 1690-100)

Dear Mr. Golden:

I appreciate the opportunity to comment on the proposed FASB statement, The Hierarchy of Generally Accepted Accounting Principles, a replacement of FASB No. 162. As a Master's of Accounting student at Bradley University, I support the FASB Accounting Standards Codification project and the benefits that it would provide to accounting research.

1. AICPA TIS Section 5100, paragraphs 38–76, would be applied prospectively for revenue arrangements entered into or materially modified in annual periods beginning on or after December 15, 2009, and interim periods within those years. Do constituents agree with the transition provisions for nonpublic entities that had not previously applied this guidance? Please explain your answer.

Yes, I agree that this should be applied prospectively. There would be little benefit from going back and applying this retrospectively.

2. Do constituents agree with the Board's conclusion that this proposed Statement would not change GAAP except as described in Question 1? If not, please provide specific examples of the changes caused by this proposed Statement.

I agree that this proposed statement would not change GAAP except as mentioned in question 1. The Codification is meant to organize and simplify GAAP literature, not change its content.

3. Do constituents agree with the July 1, 2009, effective date for this proposed Statement? If not, please provide a detailed explanation of the reason(s) for extending the implementation period.

I believe January 1, 2010 would be a more appropriate effective date for this proposed statement. This would give users time to become familiar with the Codification before these changes would be implemented. This would also provide extra time to acquire paper copies of this information for users who do not prefer the online method.

Other Comments:

I support having only authoritative and non- authoritative accounting literature. Two levels will make researching much easier and should improve the quality of accounting information. This should make the research process much more efficient and user friendly. The current FARS database I use to research with can be confusing and difficult to use at times. I look forward to using the Codification. Being able to access all authoritative accounting literature in one location will hopefully eliminate the chances of not applying the incorrect standard because you did not know that there was a more relevant standard. In research for my classes, I have found myself using statements that were superseded without realizing it. With everything thing being of equal importance, there will not be the worry that there is a more relevant or authoritative literature that should be applied.

I disagree with charging a subscription fee to use the Codification. The basic view of the Codification Topics will not be as useful as the other features that will be available only for a fee. These features will be very beneficial to professional, professors, and students. I believe that the Codification should remain free of charge to the public.

I hope the Board achieves their goal of making research easier, simplified, and less time consuming for the users.

Sincerely, Katherine E. Meismer