



**HILL & WILKINSON**  
GENERAL CONTRACTORS

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October 18, 2010

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

Reference: Revenue Recognition, File Reference 1820-100

Dear FASB:

Thank you for the opportunity to comment on the proposed changes on how we account for revenue.

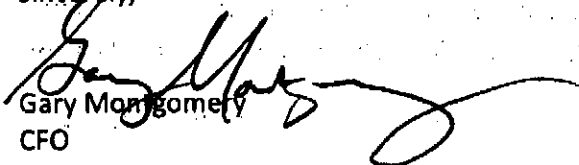
We are a general contractor doing approximately \$200,000,000 in revenue each year. We have numerous projects from a few thousand dollars up to \$50,000,000. We account for 30 – 45 projects under the current SOP81-1. These standards were developed specifically for the construction industry and have served us very well.

The proposed FASB/IASB – ASC 605 will not fit our industry. It will create great confusion, generate an enormous amount of additional costs, increase subjectivity on the financial data and decrease the reliability of the financial statement we present to our owners, banks and sureties. This is the opposite effect a new standard should accomplish.

I urge your organization to re-examine the CFMA's letters. I agree with their responses to your exposure draft questionnaire and encourage you to listen to what they have to say. They represent our industry and understand all aspects of our business.

In closing, while the ideology of a uniform revenue report process for all industries sounds good, I believe it to be impractical. Each industry needs to have accounting standards adapted to their business. Standards that provide reliable data to management and those who rely on their financial data to make critical decisions. Borrowing from what another concerned contractor said, "accounting should be a tool that is used by companies, not a burden to be borne by companies." Please consider the unintended consequences of these proposed changes on the construction industry.

Sincerely,



Gary Montgomery  
CFO

GM/pl

