



June 6, 2011

Technical Director
Financial Accounting Standards Board
401 Merritt 7, PO Box 5116
Norwalk, Connecticut 06856-5116

Re: File Reference No. 2011-180: Proposed Accounting Standards Update, *Intangibles – Goodwill and Other (Topic 350): Testing Goodwill for Impairment*

The Accounting and Auditing Procedures Committee (the “Committee”) of the Pennsylvania Institute of CPAs (“PICPA”) appreciates the opportunity to comment on the Proposed Accounting Standards Update on fair value measurements. The Committee commends the FASB for working to address the issue of financial statement complexity. The Committee agrees with the FASB’s proposed optional qualitative approach to evaluating whether or not fair value would need to be quantitatively computed. The Committee notes that in certain circumstances utilizing the qualitative approach could result in increased audit time and company effort and that in many cases companies will opt for the quantitative analysis. However, the Committee believes that the optional qualitative approach would reduce cost and complexity in certain situations. The Committee understands that the FASB cannot provide a comprehensive list of all of the qualitative factors that an entity should consider and believes that the examples provided in proposed ASC 350-20-35-3C provide sufficient guidance to enable a reasonable qualitative assessment.

The Committee also requests that the FASB consider extending this qualitative assessment option to other indefinite-lived intangible assets as conceptually there is no clear rationale for having a difference in the accounting treatment for these intangibles. Furthermore, given that many companies previously utilized the carryforward option at ASC 350-20-35-39 for their indefinite-lived intangible assets, which would be deleted under the proposed ASU, an additional unnecessary burden will be placed on these companies with no improvement in the results.

We appreciate your consideration of our comments. We are available to discuss any of these comments with you at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard E. Wortmann".

Richard E. Wortmann, CPA
Chairman, PICPA Accounting and Auditing Procedures Committee