

Please note that the comments expressed herein are solely my personal views

Effective Date and Transition

Question 13: Do you agree with the proposed transition requirements in paragraph 810-10-65-4? If not, how would you propose to amend those requirements, and why? Please provide an estimate of how long it would reasonably take to implement the proposed requirements.

In general I would suggest that retrospective application would provide the most meaningful information to users of financial statements.

Question 14: Should early adoption be permitted? If not, why?

In general I would recommend that you should permit early adoption.

Yours faithfully

Chris Barnard