

Corporate Office

March 12, 2012

Hans Hoogervorst
Chairman
International Accounting Standards Board
30 Cannon Street
London EC4M6XH
United Kingdom

Dear Mr. Hoogervorst:

Re: ED/2011/6 Revenue from Contracts with Customers

ATCO Limited and Canadian Utilities Limited are part of the ATCO Group of Companies which is a worldwide group of companies with more than 8,800 employees and assets of approximately \$12 billion. Alberta-based ATCO Ltd. is engaged in structures & logistics (manufacturing, logistics and noise abatement), utilities (pipelines, natural gas and electricity transmission and distribution), energy (power generation, natural gas gathering, processing, storage and liquids extraction) and technologies (business systems solutions). The ATCO Group appreciates the opportunity to provide comments on ED/2011/6 - Revenue from Contracts with Customers.

While the ATCO Group is largely in agreement with the IASB's proposed standard, it notes that, while this new standard will supersede IFRIC 18 - Transfer of Assets From Customers, there are no illustrative examples in the Exposure Draft to address the issues dealt with in that Interpretation. As this Interpretation provides useful guidance on the recognition of revenue when an entity receives an item of property, plant and equipment or cash from a customer, a short summary should be included with the illustrative examples in this proposed new standard. Such guidance, which has already been reviewed and approved by IFRIC, would be consistent with the level of detail in the illustrative examples that are currently in this exposure draft.

If you have any questions on this submission, please contact the undersigned at rob.neumann@atco.com.

Yours Truly,

Robert C. Neumann

Vice President, Controller