



We agree that an entity should be permitted to early adopt the proposed amendments.

*Question 10: For preparers, how much time is needed to implement the proposed amendments?
Please explain.*

For a smooth and effective transition using the modified retrospective transition method, we believe at least one year is required to implement this proposed Update to allow sufficient time to analyze all joint and several liability arrangements in contracts. We also believe that for consistency and comparability, the effective date should be the beginning of a fiscal year.

We appreciate the opportunity to provide our comments on this proposed standard.

Sincerely,

A handwritten signature in blue ink that reads 'Reed N. Brimhall'.

Reed N. Brimhall
Vice-President
& Chief Accounting Officer