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January 18, 2013

Technical Director
Financial Accounting Standards Board (FASB)
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

Re: File Reference No. 2013-200

Proposed Accounting Standards Update—*Financial Instruments (Topic 825): Clarifying the Scope and Applicability of a Particular Disclosure to Nonpublic Entities*

Dear Director:

We are pleased to provide comments on the proposal to address clarifying the scope and applicability of a particular disclosure to nonpublic entities. We appreciate the speed at which the FASB responded to the need for the clarifying language in Topic 825 once it was discovered that ASU 2011-04 included confusion as to whether certain changes to disclosures for nonpublic entities were required. We agree with the changes as proposed. We also agree the proposed amendment should be effective upon issuance.

We would be pleased to discuss our comments further with the FASB staff. Please direct questions to Stephen Bodine (stephen.bodine@cliftonlarsonallen.com) at 612/376-4791.

Sincerely,

A handwritten signature in cursive script that reads 'CliftonLarsonAllen LLP'.

CliftonLarsonAllen LLP