September 14, 2010

Russell G. Golden
Technical Director
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, Connecticut 06856-5116
director@fasb.org

Re: File Reference Number 1790-100

Mr. Golden:
Thank you very much for the opportunity to comment on the Statement of Comprehensive Income Exposure Draft (File Reference Number 1790-100).

We are a local public firm with private clients generally ranging from $1,000,000 to $100,000,000 in annual revenue. The majority of our clients do not have items included in other comprehensive income (OCI). However, our clients that do have items included in other comprehensive income are traditionally confused by the concept of other comprehensive income as they do not understand the purpose of OCI to the readers of their financial statements.

I believe that a single, continuous statement of comprehensive income would improve comparability, transparency, and understanding of financial statements. For our clients, the various presentation options increased confusion regarding OCI as they were unclear on how to approach the presentation. For our clients, a single statement would increase their understanding of the concept of other comprehensive income and reduce their costs of internal disagreements regarding the presentation of OCI.

The primary users of my clients' financial statements are lending organizations that require independent financial statements as a condition for a loan. It has been my observation, that many of the lending institutions' representatives that are assigned to our clients are not familiar with the concept of OCI as well. Our clients will likely have concerns reading showing a single statement as it may lead to confusion for their banking representative regarding which number is the net income number and how it is different from comprehensive income. As a firm practice, we meet with our clients' bankers to explain any accounting questions or concerns upon client request and consent. A standard presentation for OCI would facilitate these discussions, and provide more comparable public company examples. (Question 1)

I believe that the costs to implement this guidance would be negligible to our clients and perhaps even a savings to our clients as there would be less time spent internally on how to present OCI; however there would likely be more time needed to educate less experienced lenders (Question 4). In addition, I see no operational issues in determining the effective date of the update (Question 5).

Thank you again for the opportunity to comment.

Sincerely,

Danielle Supkis
Manager