Aime Kabongo  
1625 Rialto Way,  
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FASB Technical Director  
401 Merritt 7  
PO Box 5116  
Norwalk, CT 06856-5116  
Re: File Reference NO 1850-100

Dear Director,

I would like to contribute to the public comment about the FASB Exposure draft. I choose to comment on two questions 7, 17 and 19.

Question 7: Purchase options

I do not agree that a lessee or a lessor should account for purchase option only when they are exercised and I suggest that they account for purchase option if it mention at lease inception. This is because, exercise of the option appears reasonably certain at the inception of the lease. Numerous reasons let to conclude that the lessee will exercise the option at appropriate moment. The lease amount includes additional payment recognize by both parties; and this additional payment also represents an additional lessee’s liability that lessee’s investors and creditors need to be aware. The additional lease payment applies toward the purchase price. The exercise price will be below the asset expected market value. Option payment is rarely refundable. Therefore, I can conclude that the purchase option should be recognize at lease inception; because most than likely it will be exercise and the recognition of the purchase option will help investors and creditors of both lessee and lessor to determine their assets and liabilities.

Question 17: Benefits and costs

My opinion joints the boards’ assessment of the cost and benefits of the proposed requirement. Because present and potential investors and creditors and other users need to have an extensive and complete corporate financial information in order to make appropriate decision on how and where to invest or to lend their funds. The public still remember the collapse of some corporations such Enron, MCI and Lehman Brothers holding Inc; who were manipulated their accounting to appear as profitable companies while they were losing money. Many investors and employees lose money from the collapse of these corporations. There is also an agency conflict between management and shareholder, where management may reject some investments because of personal gain. Example, management could reject an investment even if it net present value is positive
because they would like to use funds to pay corporate jet for their own uses. Other reason, many experts believe that the recent financial crisis is due to the lack of regulation; therefore there is a need to have a determined accounting standard to prevent if not to eliminate corporate accounting manipulation. Of course the implementation of the proposed guidance will create additional cost for the corporation, but that should be considered as the cost of doing business. The proposed guidance goal is to provide complete financial information to investors, creditors and other financial users and that should be the dominant factor.

Question 19: Non-public entities
I agree that any of the proposed guidance be different for non-public entities; because the purpose of the proposed guidance and of financial accounting in general is to provide relevant financial information to external users to make a decision about the company. Investors and creditors need to know the liability level of the lessee before they invest or lend fund into to business.
Not-for-profit organizations may not need to follow the proposed guidance; because they do not collect funds from investors and they are not pursing a profit. Private companies may also not have to follow the proposed guidance because of their limited business size compared to large corporation. Banks and financial institutions dealing with private companies have expertise and way to evaluate their financial situation. For example, the sale and leaseback transaction, not-for-profit organizations or small private company are less likely to engage in this type of transaction. Therefore, it is unnecessarily to require them to follow the proposed guidance.

Sincerely,

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