April 5, 2004

Ms. Suzanne Q. Bielstein
Director of Major Projects and Technical Activities
Financial Accounting Standards Board
401 Merritt 7, P.O. Box 5116
Norwalk, CT 06856-5116

File Reference 1200-200

Dear Ms. Bielstein:

The Accounting Principles Committee of the Illinois CPA Society (Committee) appreciates the opportunity to provide our perspective on the Exposure Draft of a Proposed Statement of Financial Accounting Standards, *Earnings per Share, an amendment of FASB Statement No. 128*. The organization and operating procedures of the Committee are reflected in the attached Appendix A to this letter. These recommendations and comments represent the position of the Illinois CPA Society rather than any members of the Committee or of the organizations with which the members are associated.

We support the issuance of the proposed amendment to FASB Statement No. 128. We believe the amendment will clarify certain aspects of the earnings per share calculation and will also lead to enhanced comparability of financial statements prepared under US GAAP and those prepared under international standards.

The Illinois CPA Society appreciates the opportunity to express our opinion on this matter. We would be pleased to discuss our comments in greater detail if requested.

Sincerely,

Larry Sophian, Chair
Accounting Principles Committee
The Accounting Principles Committee of the Illinois CPA Society (Committee) is composed of the following technically qualified, experienced members appointed from industry, education, government and public accounting. These members have Committee service ranging from newly appointed to more than 20 years. The Committee is an appointed senior technical committee of the Society and has been delegated the authority to issue written positions representing the Society on matters regarding the setting of accounting standards. The Committee’s comments reflect solely the views of the Committee, and do not purport to represent the views of their business affiliations.

The Committee usually operates by assigning Subcommittees of its members to study and discuss fully exposure documents proposing additions to or revisions of accounting standards. The Subcommittees ordinarily develop a proposed response that is considered, discussed and voted on by the full Committee. Support by the full Committee then results in the issuance of a formal response, which at times, includes a minority viewpoint.

Current members of the Committee and their business affiliations are as follows:

Public Accounting Firms:

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- Jacquelyn K. Daylor, CPA
- James L. Fuehrmeyer, Jr., CPA
- Brian L. Heckler, CPA
- Alvin W. Herbert, Jr., CPA
- Steven C. Johnson, CPA
- Lisa M. Kobliniski, CPA
- Richard H. Moseley, CPA
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- Mark K. Scoles, CPA
- John M. Stomper, CPA
- Joan Waggoner, CPA

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**Deloitte & Touche LLP**

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- Kirsten M. Lescher, CPA
- Daniel J. McMahon, CPA
- Laurence A. Sophian, CPA

**Baygood, Telpner & Rose Chartered**

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**Small (less than 40 employees):**
- Walter J. Jagiello, CPA
- Kathleen A. Musial, CPA
- Roger L. Reitz, CPA
- John A. Rossi, CPA

**Walter J. Jagiello, CPA**

**Benham, Ichen & Knox LLP**

**Cray, Kaiser Ltd., CPAs**

**William F. Gurrie & Co.**

**Industry:**
- Peter J. Bensen, CPA
- Melinda S. Henbest, CPA
- James B. Lindsey, CPA
- John H. Wolter, CPA

**McDonald's Corporation**

**The Boeing Co.**

**TTX Company**

**Retired/Natural Gas Pipeline Company of America**

**Educators:**
- Leonard C. Soffer, CPA
- Charles A. Werner, CPA

**University of Illinois at Chicago**

**Loyola University**

**Illinois CPA Society**

**Staff Representative:**
- C. Patricia Mellican, CPA