Dear Director,

Please find the part of my comment regarding the above subject as follow:

**Question 2:** Do you agree that if the total of cash, cash equivalents, and amounts generally described as restricted cash or restricted cash equivalents at the beginning and end of the period shown on the statement of cash flows cannot be reconciled to the amounts of similarly titled line items on the statement of financial position, an entity should disclose on the face of the statement of cash flows or in the notes to the financial statements, the amounts and line items in which such amounts are reported within the statement of financial position? If not, please explain why that information would not be useful.

**Answer 2:** I don’t agree because the statement of financial position have to represent the real world phenomena of the figure as shown the total of cash, cash equivalents, and amounts generally described as restricted cash or restricted cash equivalents at the beginning and end of the period shown on the statement of cash flows the amount have to same with the amounts and line items in which such amounts are reported within the statement of financial position. If the reconciliation can’t be performed, it can be believed that something wrong happened and the Management Accountants have to solve this problem.

**Question 3:** Do you agree that an entity should be required to disclose information about the nature of restrictions on its cash and cash equivalents? If not, please explain why that information would not be useful.

**Answer 3:** I agree

My comment will be continued at the moment.

Best Regards,

Muhammad Sardjono Hadidjaja
Questions for Respondents
The Board invites individuals and organizations to comment on all matters in this proposed Update, particularly on the issues and questions below. Comments are requested from those who agree with the proposed guidance as well as from those who do not agree. Comments are most helpful if they identify and clearly explain the issue or question to which they relate. Those who disagree with the proposed guidance are asked to describe their suggested alternatives, supported by specific reasoning.

Question 1: Do you agree that the statement of cash flows should explain the change during the period in the total of cash, cash equivalents, and amounts generally described as restricted cash or restricted cash equivalents? If not, please explain what presentation is more appropriate and why.

Answer 1: I don’t agree. In my opinion it is more appropriate if we still split the Cash Flow into Cash inflow and Cash Outflow. It is more useful if in the Cash Outflow indicates the sustainability points for example: how much expenditure for buying anti pollution equipments, for performing the trainings of employees, for CSR activities, for the health of employee etc. Beside that it is absolutely important when the total balance of the total of cash, cash equivalents, and amounts generally described as restricted cash or restricted cash equivalents deducted by the total liability for example short term and long-term liabilities including total account payables and other liabilities. It represents the real performance of company from the application of Going Concern Principle in the real world and from the investors' view. The balance of this deduction will be a basis for tax levied by the government to a company instead of EBT (Earnings Before Tax), if the balance of this basis of tax levied is positive, Government possible to pull the tax from the company but if the balance is negative, Government cannot burden the company with tax. From the view of investors, when after tax balance is positive, it indicates Company is possible to make cash payment of dividend.

The above talking can be formulated as a new Financial Reporting named Cash of the Investors/Owner Statement and can be represented as follows:

QH Corp.
Cash of the Investors/Owner Statement
For the Year of 2050

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash Inflow</td>
<td>$ XXX.XXX.XX.XXX.00</td>
</tr>
<tr>
<td>Cash Outflow</td>
<td>XXX.XXX.XXX.XXX.00</td>
</tr>
<tr>
<td>Cash Balance</td>
<td>XXX.XXX.XXX.XXX.00</td>
</tr>
<tr>
<td>Liabilities</td>
<td>XXX.XXX.XXX.XXX.00</td>
</tr>
<tr>
<td>Cash Balance after Liabilities</td>
<td>XXX.XXX.XXX.XXX.00</td>
</tr>
<tr>
<td>Minimum Income of Investor/Owner (Personal Exemption)</td>
<td>XXX.XXX.XXX.XXX.00</td>
</tr>
<tr>
<td>Tax Basis</td>
<td>XXX.XXX.XXX.XXX.00</td>
</tr>
<tr>
<td>Corporate Tax</td>
<td>XXX.XXX.XXX.XXX.00</td>
</tr>
<tr>
<td>Cash of the Investor/Owner</td>
<td>XXX.XXX.XXX.XXX.00</td>
</tr>
</tbody>
</table>

Note: This new Financial Reporting is applied by the individual proprietorship but can be applied by Government organizations, Private Companies, Public Companies, non-profit Companies and non-profit organizations by ignoring the row of “Minimum Income of Investor/Owner (Personal Exemption)”.

Statement of Cash Flows (Topic 230) - Restricted Cash
If there are multi Currencies the formulae of the new Financial Reporting can be represented as follows:

<table>
<thead>
<tr>
<th>QH Corp.</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash of the Investor/Owner Statement</td>
<td></td>
<td></td>
</tr>
<tr>
<td>For the Year of 2050</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>USD</th>
<th>Euro</th>
<th>Yen</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash Inflow</td>
<td>XXX.XX.XX.00</td>
<td>XXX.XX.00</td>
<td>X.XXX.XX.00</td>
</tr>
<tr>
<td>Cash Outflow</td>
<td>XXX.XX.XX.00</td>
<td>XXX.XX.00</td>
<td>X.XXX.XX.00</td>
</tr>
<tr>
<td>Cash Balance</td>
<td>XXX.XX.XX.00</td>
<td>XXX.XX.00</td>
<td>X.XXX.XX.00</td>
</tr>
<tr>
<td>Liabilities</td>
<td>XXX.XX.XX.00</td>
<td>XXX.XX.00</td>
<td>X.XXX.XX.00</td>
</tr>
<tr>
<td>Cash Balance after Liabilities</td>
<td>XXX.XX.XX.00</td>
<td>XXX.XX.00</td>
<td>X.XXX.XX.00</td>
</tr>
<tr>
<td>Minimum Income of Investor/Owner (Personal Exemption)</td>
<td>XXX.XX.XX.00</td>
<td>XXX.XX.00</td>
<td>X.XXX.XX.00</td>
</tr>
<tr>
<td>Tax Basis</td>
<td>XXX.XX.XX.00</td>
<td>XXX.XX.00</td>
<td>X.XXX.XX.00</td>
</tr>
<tr>
<td>Corporate Tax</td>
<td>XXX.XX.XX.00</td>
<td>XXX.XX.00</td>
<td>X.XXX.XX.00</td>
</tr>
<tr>
<td>Cash of the Investor/Owner</td>
<td>XXX.XX.XX.00</td>
<td>XXX.XX.00</td>
<td>X.XXX.XX.00</td>
</tr>
</tbody>
</table>

Note: This new Financial Reporting is applied by the individual proprietorship but can be applied by Government organizations, Private Companies, Public Companies, non-profit Companies and non-profit organizations by ignoring the row of "Minimum Income of Investor/Owner (Personal Exemption)".

**Question 2**: Do you agree that if the total of cash, cash equivalents, and amounts generally described as restricted cash or restricted cash equivalents at the beginning and end of the period shown on the statement of cash flows cannot be reconciled to the amounts of similarly titled line items on the statement of financial position, an entity should disclose on the face of the statement of cash flows or in the notes to the financial statements, the amounts and line items in which such amounts are reported within the statement of financial position? If not, please explain why that information would not be useful.

**Answer 2**: I don’t agree because the statement of financial position have to represent the real world phenomena of the figure as shown the total of cash, cash equivalents, and amounts generally described as restricted cash or restricted cash equivalents at the beginning and end of the period shown on the statement of cash flows the amount have to same with the amounts and line items in which such amounts are reported within the statement of financial position. If the reconciliation can't be performed, it can be believed that something wrong happened and the Management Accountants have to solve this problem.
Question 3: Do you agree that an entity should be required to disclose information about the nature of restrictions on its cash and cash equivalents? If not, please explain why that information would not be useful.
Answer 3: I agree

Question 4: Would disclosures of the amounts of gross transfers between cash, cash equivalents, and amounts generally described as restricted cash restricted cash equivalents (excluding transfers, constructive or actual, that result in a concurrent cash receipt from or a concurrent cash payment to an outside source) provide meaningful information to financial statement users? Please explain why.
Answer 4: no comment

Question 5: Should any other disclosures be provided? If so, please explain what disclosures should be provided and why that information would be useful.
Answer 5: Yes, the preparers of Financial Reports should provide a disclosure regarding the change of Form of the Statement of Cash Flow to the Form of the Cash of the Investors/Owner Statement. The effort to get the good understanding about the Concept of Cash of the Investors/Owner Statement, FASB could access the website as follows: https://www.ifac.org/publications-resources/consultation-paper-meeting-future-expectations-professional-competence in Submitted Comment Letters # 35 Muhammad Hadidjaja (Indonesia).

Question 6: Do you agree that the proposed amendments should be applied using a retrospective transition method? If not, please explain what transition method would be more appropriate and why.
Answer 6: I agree.

Question 7: Do you agree that an entity should be required to provide the transition disclosures specified in the proposed Update? Should any other transition disclosures be required? If so, please explain what transition disclosures should be required and why.
Answer 7: no comment

Question 8: How much time will be necessary to implement the proposed amendments? Do entities other than public business entities need additional time to apply the proposed amendments? Why or why not?
Answer 8: I agree

Question 9: Should early adoption be allowed? Why or why not?
Answer 9: no comment
My email address: m.sardjono.hadidjaja@gmail.com from Indonesia