May 25, 2011

Ms. Susan M. Cosper
Technical Director
Financial Accounting Standards Board
401 Merritt 7, P.O. Box 5116
Norwalk, CT 06856-5116

Dear Ms. Cosper:

The Accounting Principles Committee of the Illinois CPA Society (the Committee) is a voluntary group of CPAs from public practice, industry and education. Our comments represent the collective views of the Committee members and not the individual views of the members or the organizations with which they are affiliated. The organization and operating procedures of the Committee are outlined in Appendix A to this letter.

We are writing to encourage the FASB to re-expose for comment its proposals on revenue recognition, leases and financial instruments (the priority projects) before adopting final standards. We appreciate the FASB’s efforts towards convergence and the steps it is taking to ensure the issuance of high-quality standards. We believe the priority projects would benefit from additional public exposure as part of the FASB’s due process procedures in light of the substantial changes made during its re-deliberations.

As discussed in Appendix B of the “Progress Report on IASB-FASB Convergence Work” dated April 21, 2011, the FASB and IASB will determine if re-exposure is necessary. While we are confident the FASB will make the necessary determinations for each priority project, we would like the FASB to carefully consider the significant differences that have already arisen during re-deliberations from the time the Exposure Drafts were issued. Additionally, the period of time from the original Exposure Drafts to the final Standards will in some cases exceed one year. The significance of changes made between the Exposure Drafts and final Standards could cause confusion and complexity in implementing the final Standards.

We recommend that the FASB re-expose the proposed Standards and that it highlight significant changes between the original Exposure Drafts and the re-exposed documents. We do not believe that the issuance of a document that only reflects changes to the Accounting Standards
Codification will be sufficient, as it would fail to address the FASB’s rationale and basis for changes made since the issuance of the Exposure Drafts. Re-exposure will ensure that all conclusions reached by the FASB are appropriately assessed by interested parties through due process. We believe that the issuance of final standards without re-exposure may lead to standards which may ultimately require additional clarification and guidance from the FASB.

Lastly, we ask the FASB and IASB to be more balanced in describing the progress made at achieving convergence between U.S. GAAP and IFRS. There is a difference between completing a convergence project and achieving converged standards. For many of the completed convergence projects there remain significant differences between U.S. GAAP and IFRS. Further, the progress report does not consider whether other FASB-only or IASB-only projects have lead to additional differences between U.S. GAAP and IFRS. The inference that the completion of the Memorandum of Understanding projects means that U.S. GAAP and IFRS will be substantially converged is inconsistent with the experiences of those that operate in multi-GAAP environments and unhelpful to those less informed of the convergence efforts.

We appreciate the opportunity to offer our comments.

Sincerely,

Jeffery P. Watson, CPA
Chair, Accounting Principles Committee

Scott G. Lehman, CPA
Vice-chair, Accounting Principles Committee
APPENDIX A

ACCOUNTING PRINCIPLES COMMITTEE
ORGANIZATION AND OPERATING PROCEDURES
2011-2012

The Accounting Principles Committee of the Illinois CPA Society (Committee) is composed of the following technically qualified, experienced members appointed from industry, education 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 Subcommittee ordinarily develops 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:

Large: (national & regional)
- Ryan Brady, CPA
- John A. Hepp, CPA
- Alvin W. Herbert, Jr., CPA
- Daniel J. Hoffenkamp, CPA
- Scott G. Lehman, CPA
- Elizabeth A. Prossnitz, CPA
- Robert B. Sledge, CPA
- Reva B. Steinberg, CPA
- Jeffery P. Watson, CPA

Medium: (more than 40 professionals)
- Jennifer L. Williamson, CPA

Small: (less than 40 professionals)
- Barbara Derrison, CPA
- Brian T. Kot, CPA
- Kathleen A. Masial, CPA
- Michael D. Pakter, CPA

Industry:
- Rose Cammarata, CPA
- Farah Hollenbeck, CPA
- James B. Lindsey, CPA
- Marianne T. Lorenz, CPA
- Michael J. Maffei, CPA
- Jacob R. Mrugacz, CPA
- Ralph Nach, CPA
- Anthony Peters, CPA
- Amanda M. Rzepka, CPA

Educators:
- James L. Fuchsmeyer, Jr., CPA
- Laine E. Malmquist, CPA
- Leonard C. Soffer, CPA

Staff Representative:
- Gayle S. Floresca, CPA

Grant Thornton LLP
Grant Thornton LLP
Retired, Clifton Gunderson LLP
Ernst & Young LLP
Crowe Horwath LLP
BDO USA LLP
KPMG LLP
Retired, BDO USA LLP
Blackman Kallick LLP

Ostrow Reisen Berk & Abrams Ltd.
Selden Fox, Ltd.
Cray Kaiser Ltd CPAs
BKL & Co, LLP
Gould & Pakter Associates LLC

CME Group Inc.
Hospira, Inc.
TTX Company
Nicoor Inc.
GATX Corporation
U.S. Cellular Telephone & Data Systems
SkillSmart LLC
McDonald's Corporation
JSSI

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Illinois CPA Society