

FLORIDA INSTITUTE OF CERTIFIED PUBLIC ACCOUNTANTS

325 WEST COLLEGE AVENUE • P.O. BOX 5437 • TALLAHASSEE, FLORIDA 32314
TELEPHONE (850) 224-2727 • FAX (850) 222-8190

November 30, 2005

Letter of Comment No: O
File Reference: 1235-001
Date Received: \(\) -\(\)

Financial Accounting Standards Board 401 Merritt 7 PO Box 5116 Norwalk, Connecticut 06856-5116

Attention: Technical Director - File reference 1235-001

Via e-mail: director@fasb.org

RE: Invitation to Comment: Selected Issues Relating to Assets and Liabilities with Uncertainties

Dear Director:

The Accounting Principles and Auditing Standards Committee of the Florida Institute of Certified Public Accountants (the "Committee") has reviewed and discussed the above referenced "Invitation to Comment".

The Committee agrees with the IASB's analysis of unconditional versus conditional rights and obligations in contractual settings and the proposed elimination of contingent assets and liabilities from IASB standards. We also agree with the classification as intangible assets those unconditional rights that are associated with conditional rights and that meet the definition of an asset. Furthermore, we strongly support the rationale behind separating the process of defining an asset or a liability from recognizing the asset/liability and performing its measurement.

However, the Committee also believes that the inclusion of a decision tree diagram in the final document would help clarify the process of determining the existence of assets and liabilities. Moreover, regarding the measurement requirements for non-financial liabilities, we would welcome some concrete examples that highlight the differences in measurement results obtained from applying the new cash flow technique versus the old methodology.

The Committee appreciates this opportunity to share our views and concerns. Members of the Committee are available to discuss any questions you may have regarding this communication.

Very truly yours,

Richard G. Edsall

Richard G. Edsall, CPA, Chairman
FICPA Accounting Principles and Auditing Standards Committee

Committee members coordinating this response:

Martin Norman, CPA Yanick Michel, CPA