



SOUTHERN NEW HAMPSHIRE UNIVERSITY

February 19, 2004

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Director of Major Projects & Technical Activities
File Reference No. 1200-200
Financial Accounting Standards Board
401 Meritt 7
P O Box 5116
Norwalk, CT. 06856-5116

Dear Director:

I would like to take this opportunity to comment on your recent exposure draft entitled "Earnings per Share – an Amendment of FASB Statement No. 128".

I understand that this proposal is an attempt by the Board to further improve US GAAP as well as to converge US standards with those of the International Accounting Standards Committee (IASC). I applaud the Board for its work with the IASC, although I must express caution to insure that US interests are not sacrificed in the pursuit of harmonization.

With the growing globalization of capital markets it is extremely important that the FASB and IASC continue to pursue achievement of accounting standard harmonization, especially in those areas affecting investor decision-making. Earnings per share is one of the most widely used financial statistics employed by investors and therefore is of particular importance in global comparison.

The three changes proposed in the new standard will enhance the global comparability of earnings per share. I especially commend the simplification of calculating the number of dilutive shares when applying the treasury stock method. This amendment serves to not only simplify the calculation and make it less costly to apply, but also increases the global comparability. By converging US GAAP with the international standards it should be less costly for entities to prepare cross-border financial statements because the reconciliation between the two standards should no longer be required.

The original standard did not address the issue of mandatory convertible securities. This

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omission results in diversity in how entities account for such securities when computing earnings per share. However, the exposure draft potentially insures comparability when computing earnings per share for all entities. These three changes will certainly assist the users of financial information in making better informed decisions by increasing the comparability of earnings per share data provided.

Thank you for taking the time to read this letter. Your consideration of my comments is appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard O. Hanson". The signature is fluid and cursive, with a large initial "R" and "H".

Richard O. Hanson
DBA, CPA, CMA, CFM
Professor