

#37 Collins Industrial Drive North Little Rock, Arkansas 72113 501.228.0676 800.461,2962

November 10, 2003

Letter of Comment No: 3 / File Reference: 1082-300 Date Received: 1110/03

Financial Accounting Financial Board of the Financial Accounting Foundation Attn.: TA & I Director

401 Merritt 7 P.O. Box 5116 Norwalk, CT 06856-5116

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Dear Sir:

American Leak Detection, Inc. of Little Rock, AR as a franchisee strongly opposes the most recent draft of FIN 46 which in some cases require franchisors to consolidate franchisees' financial statements. We feel that extensive burdens will be imposed on the franchising community if the provisions of FIN 46 are implemented as currently written. For instance, if we are forced to provide full financial statement information, internal control reports and adhere to internal control dictates by our franchisor costly hardships will be borne by us the franchisee. These hardships would have a very negative economic impact on us and other growing businesses that are major contributors to the economy. We fully support the intent of FIN 46 to correct abusive behavior in the business community but as issued, is unacceptable to the franchising community.

Thank you for your attention to this critical issue. We would appreciate it if you would defer the effective date of the Interpretation as it pertains to the franchising community to allow thoughtful deliberation of the appropriate accounting for such arrangements and to address the unwieldy transition and implementation issues posed by FIN 46.

Sincerely,

Edward J. Hill, CEO

American Leak Detection, Inc. of AR

cc. Tim Rennick, President, American Leak Detection John Gay, Vice-President of Government Relations, IFA