

# Wynn's International, Inc.

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December 7, 1995

Director of Research and Technical Activities  
Financial Accounting Standards Board  
File Reference 154-D  
401 Merritt 7  
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Norwalk, CT 06856-5116

|                       |          |
|-----------------------|----------|
| Letter of Comment No. | 10       |
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| Date Received         | 12/13/95 |

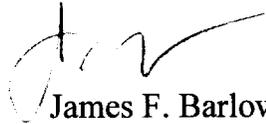
Dear Director:

I agree with the proposed standards set forth in your Proposed Statement of Financial Accounting Standards. However, there are several concepts in the Proposed Statement which are difficult to understand without examples. I highly recommend that you include in Appendix B, which is an integral part of the Statement, specific examples addressing the following concepts:

- Paragraph 19 - Illustrate the allocation of the effects on equity between the controlling interest and the noncontrolling interest of eliminating intercompany profits and losses on assets that remain within the group.
- Paragraph 19 - Illustrate the deferral of taxes paid by the seller including the tax effect of any reversing temporary differences resulting from intercompany sales where income taxes have been paid on intercompany profits on assets that remain within the group.
- Paragraph 25 - Illustrate the presentation of earnings per share data in consolidated financial statements that include subsidiaries that are not wholly owned in conjunction with or as a supplement to paragraph 107's example of allocating net income to noncontrolling and controlling interests.
- Paragraph 29 - Please illustrate how to present the amount of the change in a parent's proportionate ownership interest in a subsidiary as an increase or decrease in additional paid-in capital and as a corresponding decrease or increase in the noncontrolling interest.

I strongly believe the addition of the above examples will greatly improve the usefulness of the final Statement.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Barlow', with a long, sweeping horizontal stroke extending to the right.

James F. Barlow  
Corporate Controller  
Wynn's International, Inc.  
(NYSE:WN)