



LETTER OF COMMENT NO. 3

From: Gross, James [mailto:jagross@state.pa.us]
Sent: Thursday, January 03, 2008 2:59 PM
To: Terri Polley
Subject: Proposed Changes to FASB

In response to the Request for Comments to the Proposed Changes to the Oversight, Operations and Structure of the FASB etc...

I DO NOT support the move from a 7 member Board to a 5 member. Justification cited was a "more effective and efficient board" and one "that would be more nimble". Efficient? Perhaps, if the object is to build consensus quickly. I'm not sure that will necessarily result in better promulgated standards, just ones which can be released in a more timely fashion. If the goal of the FASB is to remain an independent, thoughtful board that facilitates robust discussion among the community, then I don't believe the two additional voices on the board are a disservice to the members of the community. Indeed, perusing your web site of the most recently issued standards shows that five of the last ten had either one or two dissenting votes. The concerns of the votes were no doubt expressed during deliberations and, based on a cursory review seemed thoughtful and rational. Reducing those potential varying viewpoints to build consensus does not seem to me to enhance "effectiveness" in any sense of the word. If "nimble" is the goal; I think the current EITF serves that purpose well.

Neither do I support allowing the chair to set the agenda, believing it introduces more risk than benefits. It concentrates the agenda with one person, whom, no matter how well intentioned, risks conforming to a *personal agenda*. Multiple voices setting an agenda for the common good serves corporate, government, and even public boards well.

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