

James A. Dwane 7614 Radcliffe Circle (206B) Port Richey, Fl 34668 LETTER OF COMMENT NO. 29

File Reference No.1620-100

November 13, 2008

## Dear Director,

- 1. I think that the proposed Statement will meet the project's objectives to improve financial reporting by enterprises involved with variable interest entities and provide more reliable information to users of financial statement by making consolidation requirements more uniform and practical.
- 3. I think the principles in paragraphs 14-14B as amended are sufficiently clear and operational and an improvement because they agree with SEC S-X 3A-02(a) which favors consolidation because "of a parent-subsidiary relationship by means other than record ownership of voting stock."
- 4. The examples in Appendix A clearly indicate how the principles in paragraphs 14-14B would be applied. The examples are very helpful.

9. Consolidated elements should not be presented separately.

Respectfully,

James A. Dwane

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