



FLORIDA INSTITUTE OF CERTIFIED PUBLIC ACCOUNTANTS

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September 25, 2009

Financial Accounting Standards Board of the Financial Accounting Foundation
401 Merritt 7, PO Box 5116
Norwalk, Connecticut 06856-5116

VIA Email Sent to: director@fasb.org

RE: File Reference 1720-100

Dear Director:

The Accounting Principles and Auditing Standards Committee (the "Committee") of the Florida Institute of Certified Public Accountants ("FICPA") has reviewed and addressed the specific questions identified in the *Consolidation (Topic 810) Accounting and Reporting for Decreases in Ownership of a Subsidiary – A Scope Clarification* during its September 2009 meeting. Our responses are below:

Question 1: Do you agree that the scope of the decrease in ownership guidance in Subtopic 810—10 should be limited to subsidiaries and groups of assets that are businesses or nonprofit activities?

Response to Question 1:

We agree that the scope should be limited to subsidiaries and groups of assets that are businesses or nonprofit activities.

Question 2: Do you agree that sales of in-substance real estate should be excluded from the scope of the decrease in ownership provisions of Subtopic 810-10 even if it is a business or non profit activity.

Response to Question 2:

We agree with the exclusion of from the scope.

Question 3: Do you agree that an entity should apply the guidance in Subtopic 810-10 for transfers of a business or nonprofit activity to an equity method investee (over which the entity has significant influence) or a joint venture (over which the entity has joint control)?

Response to Question 3:

We agree that the entity should apply the guidance to an equity method investee and a joint venture.

Question 4: Do you agree that the guidance in Subtopic 810-10 also should apply to an exchange of a group of assets that constitute a business or nonprofit activity for a noncontrolling interest in another entity?

Response to Question 4:

We believe that existing guidance for non-monetary assets is adequate.

Question 5: Is the proposed effective date operational? If not, please explain why.

Response to Question 5:

We believe the effective date is operational and will not cause undue stress or strain to those that have to implement the Standard.

The Committee appreciates this opportunity to respond to this Exposure Draft. Members of the Committee are available to discuss any questions or concerns raised by this response.

Respectfully submitted,

Laura A. Prevratil, CPA, Chair
FICPA Accounting Principles and Auditing Standards Committee

Committee members coordinating this response:

Joel Baum, CPA
Lawrence Burke, CPA