



**Texas Society of
CPA Certified Public Accountants**

June 6, 2011

Technical Director
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

RE: File Reference No. 2011-180
Intangibles—Goodwill and Other (Topic 350)

To Whom It May Concern:

One of the expressed goals of the Texas Society of Certified Public Accountants (TSCPA) is to speak on behalf of its members when such action is in the best interest of its members and serves the cause of Certified Public Accountants in Texas, as well as the public interest. The views expressed herein are written on behalf of the Professional Standards Committee (PSC) of the TSCPA. The PSC has been authorized by the TSCPA Board of Directors to submit comments on matters of interest to the committee's membership. The views expressed in this letter have not been approved by the TSCPA Board of Directors or Executive Board and, therefore, should not be construed as representing the views or policy of the TSCPA.

We are delighted to have the opportunity to provide input into your deliberations regarding the Proposed Statement of Financial Accounting Standards entitled, *Intangibles – Goodwill and Other (Topic 350)*.

Based on our discussion of the above referenced Exposure Draft (ED), we believe the guidance is consistent with the objectives set forth by the Board. We support issuance of this proposed standard and believe the guidance will assist both financial statement users and accounting practitioners.

We do have one suggestion regarding the examples included on page 9 of the ED. These examples are presented on page 9 but the disclaimer regarding the fact that these examples do not constitute an all-inclusive list is not presented until page 10. We believe the disclaimer should be stated prior to the examples so a reader does not assume that the list is an all-inclusive list of examples. This is merely a placement issue that we think avoids potential misunderstanding.

We appreciate the opportunity to provide our input to the standard-setting process.

Sincerely,

A handwritten signature in cursive script that reads "Kathryn W. Kapka".

Kathryn W. Kapka, CPA, CIA, CGAP
Chair, Professional Standards Committee
Texas Society of Certified Public Accountants