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August 23, 2013

Technical Director
Financial Accounting Standards Board
401 Merritt 7, PO Box 5116
Norwalk, CT 06856

Re: Intangibles – Goodwill and Other (Topic 350) – Accounting for Goodwill; File Reference No. PCC-13-01B

To Whom It May Concern:

The Georgia Credit Union League (GCUL) appreciates the opportunity to comment on the Financial Accounting Standards Board (FASB) in regards to its proposal on accounting for goodwill. As a matter of background, GCUL is the state trade association and one member of the network of state leagues that make up the Credit Union National Association (CUNA). GCUL serves approximately 139 Georgia credit unions that have over 1.9 million members. This letter reflects the views of our Regulatory Response Committee, which has been appointed by the GCUL Board to provide input into proposed regulations such as this.

GCUL supports the Financial Accounting Standards Board (FASB), and Private Company Council's (PCC) efforts to simplify reporting for private entities. While we generally support the scope of the proposal, we would like to remind FASB and PCC of the unique structure of credit unions.

Credit unions are member-owned, not-for-profit financial cooperatives that operate for the purpose of promoting thrift, providing credit, and other financial services at competitive rates. Credit unions goals are to help people afford life. Credit unions are also different in that, the Federal Credit Union Act limits net worth to retained earnings only. This statutory limitation restricts the ability of the NCUA to adjust its regulations in response to changes in accounting standards, as is possible for other federal financial regulators. For credit unions the financial statement users are very different from those of a bank, including both public and private

We believe the types of entities noted in the proposal are appropriate, as are the transactions and accounts, which are referenced. We would not oppose the expansion of the proposal to other entities, such as those falling within the FASB's definitions of "publicly traded company" and "not-for-profit entity."

We also believe the proposed accounting alternative, when elected, would continue to provide decision-useful information to users of private company financial statements, while reducing the cost and complexity associated with the current goodwill impairment test. While there is generally a cost associated with adopting and implementing any new guidance or regulation, we feel the overall impact on credit unions will be minimal.

The accounting alternative for goodwill would be applied prospectively for all existing goodwill and for all new goodwill generated in business combinations after the effective date. We support prospective application of the alternative. However, we ask the FASB not to allow retrospective application, due to the associated complexities.

We would like to see the effective date established as soon as is practical, since the application is at the discretion of the reporting entity. We would also like to see early application of the alternative be permitted.

GCUL appreciates the opportunity to present comments on behalf of Georgia's credit unions. Thank you for your consideration. If you have questions about our comments, please contact Selina Gambrell or Cindy Connelly at (770) 476-9625.

Respectfully submitted,

A handwritten signature in cursive script that reads "Selina M. Gambrell". The ink is dark and the signature is written in a fluid, connected style.

Selina M. Gambrell
Compliance Specialist