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September 19, 2013

Technical Director
FASB
401 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116

RE: Definition of a Public Business Entity; File Reference No. 2013-310

To Whom It May Concern,

The Georgia Credit Union League (GCUL) appreciates the opportunity to comment on the Financial Accounting Standards Board (FASB) proposal on the Definition of a Public Business Entity. 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.

This very important proposal would amend the Master Glossary of the *FASB Accounting Standards Codification* to redefine "public business entity"; and also identify the types of organizations that would be excluded from the scope of the draft *Private Company Decision-Making Framework: A Guide for Evaluating Financial Accounting and Reporting for Private Companies*. GCUL strongly supports FASB's proposal.

The proposed amendments would define a public business entity as a business entity meeting any one of the following criteria:

1. It is required by the U.S. Securities and Exchange Commission (SEC) to file or furnish financial statements, or does file or furnish financial statements, with the SEC (including other entities whose financial statements or financial information are required to be or are included in a filing).
2. It is required by the Securities Exchange Act of 1934, as amended, or rules or regulations promulgated under the Act, to file or furnish financial statements with a regulatory agency.

3. It is required to file or furnish financial statements with a regulatory agency in preparation for the sale of securities or for purposes of issuing securities.
4. It has (or is a conduit bond obligor for) unrestricted securities that are traded or can be traded on an exchange or an over-the-counter market.
5. Its securities are unrestricted, and it is required to provide U.S. GAAP financial statements to be made publicly available on a periodic basis pursuant to a legal or regulatory requirement.

We feel that this change is needed. As proposed, credit unions would be excluded from the “public business entity” definition, which would allow their regulators, such as the National Credit Union Administration (NCUA) to have a significant role in permitting their regulated entities to apply certain modified standards that would still qualify as Generally Accepted Accounting Principles (GAAP).

The financial statement users of a credit union are very different from those of publicly traded companies. The primary users of credit unions’ financial statements are credit union boards, membership, and the NCUA. We believe that the financial reporting framework for credit unions should be recognized as different from publicly traded entities, and therefore, credit unions should not be subject to requirements that are relevant only to companies with investors.

We ask that the FASB work closely with the regulatory agencies that oversee non-public / private entities that are required to adhere to GAAP, including financial institutions, so that if adopted, eligible credit unions will be able to take full advantage of any appropriate flexibility in financial reporting.

We believe this proposal appreciates key distinctions between organizations such as credit unions and others that are publicly traded, and that GAAP reporting requirements can and should be tailored to reflect those differences.

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".

Selina M. Gambrell
Compliance Specialist