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February 10, 2016

Russell G. Golden
Financial Accounting Standards Board
401 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116

Re: Proposed Accounting Standards Update— *Government Assistance (Topic 832): Disclosures by Business Entities about Government Assistance* (File Reference No. 2015-340)

Dear Mr. Golden,

We appreciate the opportunity to comment on the FASB's proposed Accounting Standards Update, *Government Assistance (Topic 832): Disclosures by Business Entities about Government Assistance*. BIGcontrols is a financial technology company providing cloud-based solutions for government incentives compliance management. While we agree with the Board's objectives to increase transparency through new disclosure requirements about government assistance, we believe the proposed ASU falls short in some areas.

Our responses relate specifically to Questions 1, 3, 5, 6, 8, 9, 10, 11, and 12 put forth in the Exposure Draft.

Question 1: Do you agree that the scope of the amendments in this proposed Update should be limited to legally enforceable agreements in which an entity or entities receive value from a government? Do you also agree that the scope of the proposed amendments should not apply to transactions in which the government is (a) legally required to provide a nondiscretionary level of assistance to an entity simply because the entity meets applicable eligibility requirements that are broadly available without specific agreement between the entity and the government or (b) solely a customer? If not, what other types of arrangements should be included in or excluded from the scope of the amendments in this proposed Update? Explain why.

We agree that the scope of the proposed ASU should include legally enforceable agreements in which an entity

receives value from a government. However, we do not agree that the scope should be limited in this manner. Rather, we believe the scope should be broadened to include transactions in which the government is legally required to provide a nondiscretionary level of assistance to an entity simply because the entity meets applicable eligibility requirements that are broadly available without specific agreement between the entity and the government. A similar lack of transparency exists for nondiscretionary programs. If the objective of the Board is to provide financial statement users improved information on an entity's financial results, we believe it would be beneficial to include a more holistic view.

Additionally, we believe the Board should look to ASC 740 for all government assistance related to income tax. We also believe that diversity in practice exists today in disclosures under Topic 740. With that in mind, we feel the Board should consider updating Topic 740 to provide additional guidance and clarity around income tax related disclosures.

Question 3: Do you agree that the scope of the proposed amendments should not exclude government assistance agreements that are within the scope of Topic 740, Income Taxes? If not, explain why.

We believe that the scope should exclude income tax related agreements since those disclosures should be made under the guidance of Topic 740. As mentioned above, we feel the Board should update Topic 740 to provide additional guidance and clarity around income tax related disclosures – and require these disclosures to mirror those under consideration in Topic 832.

Question 5: Are the proposed scope and disclosure requirements operable and auditable? Do your existing information sets and systems, internal controls, and so forth capture the information required to be disclosed by the proposed amendments? If not, which aspects of the scope or disclosures pose operability, auditability, and/or cost issues and why?

We believe the proposed scope and disclosure requirements are operable and auditable. Our SaaS platform provides a system, including audit and internal controls, to capture all the data required for disclosure under the proposed ASU. Our system is also designed to be fully compliant with the proposed ASU and provide audit teams with auditable reports. However, we believe that companies that do not currently have such systems in place could potentially be impacted by costs to develop tracking systems that comply with the proposed ASU.

Question 6: Do you agree that an entity should be required to disclose, unless impracticable, the amount of government assistance received but not recognized directly in any financial statement line item? If not, explain why.

We agree that an entity should be required to disclose, unless impracticable, the amount of government assistance received but not recognized directly in any financial statement line item. Users of financial information cannot fully analyze a company's future financial health without the ability to forecast an entity's long term financial benefits related to government assistance.

Question 8: For users, do you agree that the information required by the proposed amendments would improve transparency about government assistance agreements? Is the information required by the proposed amendments important for your analysis of an entity? If so, specify which disclosures and why. If not, identify the disclosures and explain why. Is there additional information that should be required to be disclosed in the notes to financial statements? If so, be specific.

We agree that the information required by the proposed amendments would improve transparency about government assistance agreements. We believe the information required by the proposed amendments is extremely important for users of financial information.

Question 9: The proposed amendments would not amend Topic 270, Interim Reporting, to add any specific interim disclosure requirements. Instead, required interim disclosures about government assistance would be limited to material changes occurring since the most recent annual period. Should the proposed amendments include additional interim disclosure requirements? If so, what disclosures do you think should be added and why?

We agree that the proposed ASU should not add any interim disclosure requirements. We also support the limitation of interim disclosures related to material changes occurring since the most recent annual period.

Question 10: Do you agree that the amendments in this proposed Update should be applied to all agreements (a) existing at the effective date and (b) entered into after the effective date with retrospective application permitted? If not, explain why.

We agree that the amendments in the proposed ASU should be applied to all agreements (a) existing at the effective date and (b) entered into after the effective date.

Question 11: The proposed amendments would apply to both public business entities and nonpublic business entities (private companies). Should the proposed amendments be different for nonpublic business entities? If so, describe why and how you think they should be different.

We agree that the proposed ASU should apply to both public and nonpublic entities.

Question 12: How much time would preparers need to implement the proposed amendments? Should the amount of time needed to implement the proposed amendments by entities that are not public business entities be different from the amount of time needed by public business entities?

We believe the time required for compliance may vary significantly by entity, whether public or nonpublic. However, the effective date should be the same for both types of entities. We also believe the ASC should become effective within 9 to 12 months of when it's issued.

We appreciate the opportunity to provide comments as the Board works to provide increased transparency through disclosures about government assistance. If you have any questions, please do not hesitate to contact me at 415.519.5500.

Sincerely,



Scott S. Nelson
Chief Executive Officer