



Feb. 22, 2017

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

Re: File Reference No. 2017-210 — Proposed Accounting Standards Update—Inventory (Topic 330):
Disclosure Framework—Changes to the Disclosure Requirements for Inventory

The Accounting and Auditing Procedures Committee (the committee) of the Pennsylvania Institute of Certified Public Accountants (PICPA) appreciates the opportunity to comment on the proposed accounting standards. The PICPA is a professional CPA association of more than 22,000 members working to improve the profession and better serve the public interest. Founded in 1897, the PICPA is the second-oldest CPA organization in the United States. Membership includes practitioners in public accounting, education, government, and industry. The committee is composed of practitioners from both regional and small public accounting firms, members serving in financial reporting positions, and accounting educators.

The committee generally supports the proposed disclosures included in the proposed accounting standards update. However, the committee believes that for some entities that apply the LIFO cost flow assumption to their inventories, providing the excess of replacement cost or current cost over the reported inventory amount, as proposed at 330-10-50-13, could be excessively burdensome. The committee believes that in some cases the costs could exceed the value of the disclosure, and recommends that this proposed requirement be eliminated from the proposal or required only for public entities.

We appreciate your consideration of our comments. We are available to discuss any of these comments with you at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Williams".

Robert E. Williams, CPA
Chair, PICPA Accounting and Auditing Procedures Committee