Letter of Comment No: 2
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Technical Director
Financial Accounting Standards Board
401 Merritt 7
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Norwalk, Connecticut 06856-5116

Re: Exposure Draft - FASB Staff Position FAS 142-d - *Amortization and Impairment of Acquired Renewable Intangible Assets*

The Accounting Principles and Auditing Standards Committee of the Florida Institute of Certified Public Accountants (the Committee) has reviewed and discussed the above referenced exposure draft. The Committee has the following comments:

Issue 1. The Committee agrees that it would be unusual for information about future cash flows to be unavailable but suggests that there may be times when the information that is available may be highly unreliable.

Issue 2. The Committee agrees that specific guidance is not necessary.

Issue 3. The Committee agrees with the decision not to address substantial cost.

The Committee appreciates the opportunity of share our views and concerns and to comment on the above exposure draft. Members of the Committee are available to discuss any questions you may have regarding this communication.

Very truly yours,

Richard G. Edsall

Richard Edsall, CPA, Chairman
FICPA Accounting Principles and Auditing Standards Committee

Committee members coordinating this response:
Yanick Michel CPA
Kathryn Means, CPA