

GREENHORNE &



O'MARA, INC.

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GENERAL CIVIL  
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ENVIRONMENTAL  
GEOGRAPHIC SCIENCES

October 10, 2003

Financial Accounting Standards Board  
Attention: Mr. Robert H. Herz, Chairman  
401 Merritt 7, P. O. Box 5116  
Norwalk, CT 06856-5116

**Letter of Comment No: 204**  
**File Reference: 1100-LEU**  
**Date Received: 10/10/03**

Dear Chairman Herz:

Greenhorne & O'Mara, Inc. joins the Design Professionals Coalition (DPC) of the American Council of Engineering Companies (ACEC) in expressing its concerns regarding the critical impact that we believe that the Statement of Financial Accounting Standards No. 150 (SFAS 150) will have on the businesses of numerous employee-owned and other non-public entities in the United States. We urge the Financial Accounting Standards Board to reconsider its decision to make SFAS 150 applicable to non-public entities.

While we believe that there are benefits that SFAS 150 can provide in the context of public entities, we believe that SFAS 150 will have severe and unwarranted effects when applied to employee-owned and other non-public entities.

In support of the position of the DPC on this issue, Greenhorne & O'Mara, Inc. respectfully urges the Financial Accounting Standards Board to reconsider its decision to make SFAS 150 applicable to non-public entities.

Sincerely,

John J. Healey, Chairman, President, and CEO  
Greenhorne & O'Mara, Inc.

cc: James H. Suttle, Chairman, DPC  
Richard L. Corrigan, Vice Chairman, DPC