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Financial Accounting Standards Board
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Gentlemen:

We are pleased to comment on the Exposure Draft, "Consolidated Financial Statements: Policy and Procedures." We support issue of this document.

We believe this document presents a rational and understandable, and improved, approach to determine when an entity should be consolidated in another entity's financial statements. This document will change some existing guidelines and will require a greater use of judgment, which we think preparers, auditors, and users will be able to understand and accept.

However, we do suggest that the FASB reconsider one element of this document. Paragraph 23 indicates that two net income numbers shall be reported, one for consolidated net income and one for the controlling interest's net income. We believe this will be more confusing than beneficial. From the view of the shareholders of the parent, net income is what they get or what inures to their benefit. It will be confusing to those shareholders to see a consolidated net income amount, which these shareholders will believe to be theirs (perhaps in part due to "that's the way it has always been.") But it's not theirs, as the FASB recognizes when it says the consolidated net income attributable to the controlling shareholders must be disclosed and is the "real" net income for EPS purposes. We believe treating the noncontrolling interest's share of consolidated net income as an expense, as is done today, will result in less confusion and will not cause irreparable harm to the rest of the document.

Please contact Jim Brown if you have any questions.

Very truly yours,

Crowe, Chizek and Company LLP

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