



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

Re: File Reference No. 1640-100

Dear Sir,

The Financial Reporting Committee ("FRC") of the Institute of Management Accountants ("IMA") is writing to provide its views on the Proposed Statement of Financial Accounting Standards, *Subsequent Events*). The FRC is comprised of representatives from preparers of financial statements of the largest companies in the world, the largest accounting firms in the world, valuation experts, accounting consultants as well as academics. The FRC reviews and responds to research studies, statements, pronouncements, pending legislation, proposals, and other documents issued by domestic and international agencies and organizations.

We support the Board's decision to carry forward, with certain modifications, the guidance in AU Section 560, Subsequent Events, into a separate Statement of Financial Standards and agree with the Board's observation that the proposed modifications to AU Section 560 would not be expected to result in any significant changes to current practice. We believe the accommodation in Issue 1 is operational, the related disclosures appropriate and the scope exceptions in issue 3 warranted to clarify the literature. However, we would like the Board to consider the use of an "authorization date" within the standard which would allow a company to perform their subsequent event procedures through a date prior to the financial statement issuance date or available to be issued date, not to exceed five days. We feel that this modification to the standard is useful and would ensure diligent subsequent event procedures are being performed prior to the issuance of company financial statements.

We appreciate the Board's consideration of these matters and welcome the opportunity to discuss any and all related matters.

Sincerely,

Mick Homan
Chair, Financial Reporting Committee
Institute of Management Accountants