



February 12, 2010

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

Sir David Tweedie  
Chairman  
International Accounting Standards Board  
30 Cannon Street  
London EC4M 6XH  
United Kingdom

Dear Mr. Herz and Sir Tweedie:

Following discussions held during Financial Executive International's ("FEI"), Current Financial Reporting Issues ("CFRI") conference, the Committee on Corporate Reporting ("CCR") of ("FEI") would like to offer its assistance with the ongoing MoU projects. As preparers, we believe we are uniquely positioned to assist the FASB and IASB in the development of strategies to address the multitude of potential challenges resulting from the implementation of a significant number of new standards that would need to be implemented to achieve convergence with IFRS as well as the attendant risks to financial reporting. Such challenges could include the reliability of information requested, the collection of such data in a global organization, implementation of system changes in a disparate systems environment which exists in most companies and the costs related to both the implementation and ongoing support needed to provide the information. In addition, we may be able to assist the FASB and IASB in obtaining feedback from the analyst community with whom corporate investor relations departments interact with regularly. As we consider the implementation of these significant standards, we share a common focus in maintaining the reliability and transparency of financial reporting during this time.

FEI is a leading international organization of 15,000 members, including Chief Financial Officers, Controllers, Treasurers, Tax Executives and other senior financial executives. CCR is a technical committee of FEI which reviews and responds to research studies, statements, pronouncements, pending legislation, proposals and other documents issued by domestic and international agencies and organizations.

To assist the FASB and IASB in furthering its understanding of such issues, we propose that our companies provide corporate representatives to work as part of smaller resource groups with FASB and IASB project managers as they conduct their ongoing research as convergence projects continue to evolve. We commit to you that our representatives would be subject matter experts on the areas to which they are assigned so that practical and relevant real world experiences are brought to the table. We believe this process would assist in identifying obstacles and risks early in the process and support the Board in determining an appropriate timeline for standards implementation.

We would propose that this be coordinated through the respective CCR FASB and IASB subcommittee chairs. The subcommittees can work with the FASB and IASB staffs to develop a process to identify subgroups aligned with each respective convergence project as you deem appropriate. Financial Statement Presentation – direct cash flow would be a project of interest to start with. If this proposal is acceptable, please advise of the appropriate contact(s) at your organizations with whom we can coordinate next steps.

In addition CCR would continue to have quarterly meetings with FASB and IASB to provide broader insight.

Should you have questions or require further information, please do not hesitate to contact me at [Hanish\\_arnold\\_c@lilly.com](mailto:Hanish_arnold_c@lilly.com) or (317) 276-2024.

Sincerely,

A handwritten signature in black ink, appearing to read "Arnold Hanish". The signature is fluid and cursive, with a large initial "A" and "H".

Arnold C. Hanish  
Chair, Committee on Corporate Reporting  
Financial Executives International