

November 5, 2010

Mr. Russell Golden  
Technical Director  
Financial Accounting Standards Board  
401 Merritt 7, PO Box 5116  
Norwalk, CT 06856-5116

By e-mail: [director@fasb.org](mailto:director@fasb.org)

**Re: Exposure Draft, Proposed Accounting Standards Update, *Business Combinations (Topic 805): Disclosure of Supplementary Pro Forma Information for Business Combinations***

**(File Reference No. EITF 100G)**

Dear Mr. Golden:

The New York State Society of Certified Public Accountants, representing more than 27,000 CPAs in public practice, industry, government and education, welcomes the opportunity to comment on the above captioned exposure draft.

The NYSSCPA's Financial Accounting Standards Committee deliberated the exposure draft and prepared the attached comments. If you would like additional discussion with us, please contact Mark Mycio, Chair of the Financial Accounting Standards Committee at (212) 838-5100, or Ernest J. Markezin, NYSSCPA staff, at (212) 719-8303.

Sincerely,



Margaret A. Wood  
President

Attachment



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**NEW YORK STATE SOCIETY OF  
CERTIFIED PUBLIC ACCOUNTANTS**

**COMMENTS ON  
EXPOSURE DRAFT, PROPOSED ACCOUNTING STANDARDS UPDATE,  
*BUSINESS COMBINATIONS (TOPIC 805): DISCLOSURE OF*  
SUPPLEMENTARY PRO FORMA INFORMATION FOR BUSINESS  
COMBINATIONS**

**(FILE REFERENCE NO. EITF100G)**

**November 5, 2010**

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**New York State Society of Certified Public Accountants  
Financial Accounting Standards Committee**

**Comments on**

**Exposure Draft, Proposed Accounting Standards Update, *Business Combinations*  
(Topic 805): *Disclosure of Supplementary Pro Forma Information for Business  
Combinations*  
(File Reference No. EITF100G)**

We have reviewed the Exposure Draft, Proposed Accounting Standards Update, *Business Combinations, Disclosure of Supplementary Pro Forma Information for Business Combinations* (the “Exposure Draft”) and appreciate the opportunity to provide our comments. We have the following comments posed by the Board and our response.

The following consensus was reached at the September 16, 2010 EITF Meeting:

*Issue 10-G—Disclosure of Supplementary Pro Forma Information for Business Combinations*

This issue arose as a result of diversity in the interpretation of the pro forma rules contained within ASC 805, *Business Combinations*.

Pro forma disclosures contained within the footnotes should be presented as if the business combination occurred at the beginning of the prior annual period.

Effective prospectively for business combinations occurring in fiscal years beginning after December 15, 2010, with early adoption permitted.

We agree to the consensus of opinion as set forth above, and also agree with Questions 1, 2 and 3 of the Exposure Draft. With respect to Question 4, we do not believe the effective date, first annual period beginning after December 15, 2010, reported on a prospective basis, provides enough time for financial statement preparers to effectively implement the proposed amendments.