From: Hollie Millard

To: Director - FASB

Subject: File Reference No. 2012-100

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Technical Director
File Reference No. 2012-100
FASB
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April 23, 2012

Dear Sirs and Madams,

I am only a CPA Exam candidate, a Want-A-Be CPA Auditor that study for the exams. I am a tax return preparer. While attending classes my professor gave us insight to problem solving with an example. I was struck by the solution presented to a problem by a young girl that saw a truck stuck under a bridge and while many men worked on a solution to get the big truck around the bridge and on its way, the young girl said, "Why don't they let the air out of the tires." That was an exact solution enabling the truck to carry on in a short time without much expense or damage, or being rerouted 100's of miles out of its way. On the issue of Goodwill I tried the approach of the young girl. Why not leave Goodwill on the books as it was first possessed with the purchase of the asset, a disclosure at most stating what the intangible is and that its value may have changed.

A very fundamental practice is to leave the fair market value of real estate off the books and out of the financial statements. Only if it is sold would the original value change. Testing for impairment on building or properties could be the same as testing for impairment for Goodwill. Users of the financial statements need no more than a disclosure on Goodwill if that. I am not willing to go into the very complex and illusive personality of investors and the market which is what is approached when trying to find a fair market price for the intangible; however, if a company owns a brand name, isn't it true that there is a general knowledge of what that is worth and the investor may know more than the accountant about its value.

Another very fundamental concept in accounting is that the cost of the accounting procedure should not outweigh the benefit of the information. How much cost is involved in both in house and audits to research something that is "intangible"? I cannot imagine the time and involvement that it takes for an accountant to leave working on a financial statement and go searching for the value of brand name, song, or logo in the marketplace. No wonder there was so many complaints.

I say just leave it on the books as it is as it was purchased and disclose the Goodwill if necessary. Let the users of the financial statements figure it out. That would provide more transparency than tests for impairment on Goodwill that a lot of people don't understand.

HM Tax Service Atascadero, CA