From:
 Tim Neu

 To:
 Director - FASB

Subject: Proposed ASU - Personnel Services Received from an Affiliate

Date: Wednesday, September 19, 2012 2:54:20 PM

RE: Reference Number: EITF-12B

Dear FASB,

I am writing on behalf of Wycliffe Associates, Inc. (WA) in response to the Proposed ASU referenced above. WA is a 501(c)(3) organization whose activities include the providing of contributed services to partner organizations assisting WA in accomplishing its exempt purpose.

WA does not see the need for the proposed standard as the existing standards provide adequate guidance for recognizing and reporting contributed services. WA has the means and methods for functioning under the existing standards. Adding the proposed standard in its current form would not pose an immediate impact to WA as WA does not currently fit the definition of an affiliate in relationship to any of the partner entities to whom services are provided.

Our concern is that the proposed standard would at some point expand in scope to include non-affiliate organizations like WA. Should the proposed standard change or expand the result for WA would be increased administrative costs thereby reducing the amount of funds available for program related activities. This reduction in program funding would negatively impact WA's effectiveness in accomplishing the charitable purposes for which the organizations exists.

Specific areas of administrative costs we foresee being affected include:

- 1) Changes to the organizations accounting structure to accommodate more detailed tracking of actual costs related to providing the services,
- 2) Added administrative staff to manage and report information to partner entities in a timely manner, and
- 3) Increased professional fees related to the complexity of reporting information received from or reported to partner entities

In addition to the increased administrative costs, another concern is that the proposed standard would require WA to disclose compensation information that may otherwise be inappropriate to provide to a partner entity receiving the services.

Based on the concerns mentioned, the proposed standard should it expand beyond the current form would not be in WA's best interest.

We realize there are organizations receiving services that would benefit from the proposed standard in that they would be allowed to report revenue that would not otherwise be reportable. In an effort to value the benefit to receiving organizations, we would recommend an alternative approach to the proposed standard. The alternative approach would be voluntary in nature rather than compulsory taking into consideration the benefit to receiving organizations as well as the potential burden to providing organizations.

The voluntary approach we propose is that an organization receiving services has the option to report the revenues from the services received if the providing organization is 1) able to provide the actual cost information, and 2) willing to share that information with the receiving organization. This approach would allow for providing organizations to evaluate the costs associated with providing information to receiving organizations and choose to decline if costs negatively impact program activities.

Thank you for the opportunity to comment.

Sincerely,

Tim Neu

Wycliffe Associates Vice President of Finance 11450 Translation Way

Orlando, Florida 32832

Timothy F. New

Phone: 407-852-5374 Fax: 407-992-8675