

To: CommentLetters

From: Joseph E. Koscielny

To Technical Director, Financial Accounting Standards Board:

The following are my comments regarding the specific questions regarding the proposal:

1. Do you believe the proposal contained in paragraphs 16–29 will improve the accounting standard-setting process for private companies?

Yes. Certain recent pronouncements such as FIN 46R, FASB 123R and 150 indicate a need for improvement, consideration of the private company needs.

2. Specific to paragraphs 16–29 do you believe that the proposed changes will help ensure that the financial reporting needs of constituents of private companies are met?

Yes. Since the committee, as proposed, will be made up of people who specifically deal with private companies and have some knowledge of public company requirements.

3. The FASB and the AICPA believe that any differences in generally accepted accounting principles (GAAP) for private companies should be based on financial statement user needs and cost-benefit considerations. Do you agree?

Yes. If the statements do not meet the user needs why include excess information that is costly for the private company to prepare.

4. The FASB and the AICPA believe that members of the committee (except the chair) should not be compensated beyond a reasonable reimbursement of expenses. Do you agree?

Yes. Since the set up of the committee as proposed covers the array of people directly affected by private companies, I believe this is a subject that many people are passionate about and you should not have a problem finding qualified people willing to serve and provide guidance. I believe these people should be compensated in full for their out of

pocket expenses and not receive any additional compensation.

5. The FASB and the AICPA believe the committee should set its own agenda and priorities. Do you agree?

Yes, otherwise they will be perceived as being controlled by other parties that would tend to cast a shadow of doubt over the purpose of any of their recommendations.

By addressing the private company needs of the users, preparers and auditors, I believe there is a potential of more input and support from professionals who have felt they were being ignored in the past by standards that they felt were being driven by the public companies. I commend the FASB and AICPA on moving forward with this venture.

Sincerely yours,

Joseph E. Koscielny, CPA/ABV, CFE
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