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Via email to director@fasb.org

Susan M. Cospers
Technical Director
Financial Accounting Standards Board
401 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116

Re: File Reference No. PCC-15-01 - Effective Date and Transition Guidance
Intangibles—Goodwill and Other (Topic 350)
Business Combinations (Topic 805)
Consolidation (Topic 810)
Derivatives and Hedging (Topic 815)

Dear Ms. Cospers:

We are pleased to respond to the Board's proposal to address the concerns of private company stakeholders about the effective dates and transition guidance for the four existing PCC accounting alternatives, as well as the related preferability questions for entities considering a change in their accounting principles.

We support the proposal and believe it adequately addresses the concerns leading to this exposure draft. Providing transition relief along these lines for entities that choose to adopt the accounting alternative(s) in the future is consistent with many of the same objectives the Board had in initially issuing them. To that end, we suggest clarifying that interim adoption is permitted under the final amendments.

As indicated in our previous letters related to the private company council, we continue to support the PCC's advisory role to the FASB in connection with its standard-setting activity for public and private entities.

We would be pleased to discuss our comments with the FASB staff. Please direct questions to Chris Smith at 310-557-8549 or Adam Brown at (214) 665-0673.

Very truly yours,

BDO USA, LLP