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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: Proposed Accounting Standards Update, *Effects on Historical Earnings per Unit of Master Limited Partnership Dropdown Transactions* (File Reference No. EITF-14A)

Dear Ms. Cospers:

We are pleased to provide comments on the proposal related to the presentation and calculation of historical earnings per unit of common control master limited partnership (MLP) dropdown transactions.

In that context, for purposes of calculating historical earnings per unit, we agree that the allocation of the earnings (losses) of a transferred business before the date of a dropdown transaction be allocated entirely to the general partner interest. We also agree that the scope of the proposed amendments should be limited to entities within the scope of the MLPs in Subsections of Topic 260 and support the disclosure requirements proposed in this update. We believe the amendments in this proposed update would be an improvement to GAAP and eliminate diversity in practice.

We agree with the proposed retrospective method of adoption because it improves comparability. We recommend an effective date for annual periods and interim periods within those annual periods beginning after December 15, 2015 together with an option to early adopt if the financial statements have not been previously issued. We believe that would provide sufficient time for both public and private entities to implement the new standard.

We would be pleased to discuss our comments with the FASB staff. Please direct questions to Adam Brown at (214) 665-0673 or Gautam Goswami at (312) 616-4631.

Very truly yours,

BDO USA, LLP