Sir or Madam:

There is an irreconcilable difference between the preparing comparable financial statements for investors and efficiently measuring the performance of a private company as the goals are different. It’s clear to most that the profession has failed in both endeavors. Financial statements are so complex you need to be in the business to read them and have any reasonable expectation of understanding what they say, yet as evidenced by so many financial surprises the very industry that has received the most attention in financial standards can not be effectively measured, nor are the results comparable between these financial institutions.

At the same time, private companies that need access to debit, or to provide public accountability such as non-profits, are forced into compliance with regulations that are expensive and ineffective for their purpose.

I would think separating private from public is key to getting off the tread mill the industry upon which the industry has found itself. An international board established by the international accounting associations could undertake a minimum set of accounting standards by industry which would be considerably more effective and useful than the proposed solution as they accounting standards would be focused upon measuring the performance of a business, not comparable financial statements at any cost.

Best Regards,

Doug Gledhill