Board of Trustees  
Financial Accounting Foundation  
401 Merritt 7, P.O. Box 5116  
Norwalk, CT 06856-5116  

Dear Financial Accounting Foundation:

I urge the FAF to adopt the recommendations made by the Blue Ribbon Panel on Private Company Financial Reporting regarding differential standards and a separate standard-setting entity for private companies. I feel this change is required to effectively bring about meaningful financial statements for private companies and the users of their financial statements.

FASB carries out the SEC’s statutory responsibility for accounting standards, so it is destined to primarily reflect the capital markets and investors' needs. The panel was right in that it does not make sense to incur major cost to comply with standards that have become ever more inappropriate in the private company world.

A new, separate body with standard-setting authority must be established directly under FAF and not subject to FASB approval. Without such a body, the differences needed in the standards are unlikely to occur, just like with past committees and efforts.

Users and preparers of financial statements as well as others provided valuable and adequate research to the panel on the problems and needed solutions related to private company financial reporting. Differential standards and an autonomous standard-setting body to implement them for private companies are needed now.

Thank you.

Sincerely,

Ronald Barthell  
CPA practitioner  
Baker Tilly Virchow Krause, LLP