Board of Trustees  
Financial Accounting Foundation  
401 Merritt 7, P.O. Box 5116  
Norwalk, CT 06856-5116  
presidentsdesk@f-a-f.org

Dear Financial Accounting Foundation:

I strongly support 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. Private companies and the users of their financial statements need this change to have sensible, constructive financial reports.

A systemic problem exists. FASB carries out the SEC's statutory responsibility for accounting standards, so it is certain to largely reflect the capital markets and investors' needs. Further, there is not a proper weighing of costs and benefits when it comes to setting standards for private companies.

Private company financial reporting, as it stands now, is too intricate, embodies too much inappropriate information and is too costly and time-consuming given its benefits. Substantive differences in current and future standards for private companies, where appropriate, are necessary.

It might be the most important recommendation to implement a new, separate body with standard-setting authority to be established directly under FAF and not subject to FASB approval.

Differential standards and an autonomous standard-setting body to implement them for private companies are needed now. The panel's report is based on a year of debate, research efforts spanning 30 years and participation from private companies and their financial statement users, among others.

Thank you.

Sincerely,

Angela Achenbach
CPA practitioner
Baker Tilly Virchow Krause, LLP