

April 22, 2011

Financial Accounting Foundation
Attn: Trustee Working Group
Standard Setting for Nonpublic Entities
401 Merritt 7
P.O. Box 5116
Norwalk, Connecticut 06856-5116

Dear Trustee Working Group:

I urge the Trustee Working Group to support the full implementation of the recommendations made by the Blue Ribbon Panel on standard setting for nonpublic entities. The exponential proliferation of new accounting standards and the related disclosures has placed a tremendous administrative burden on nonpublic issuers of financial statements based on Generally Accepted Accounting Principles (GAAP).

In my practice, as an audit partner in a regional CPA firm working with medium sized privately owned organizations, I have been alarmed at the increasing frequency of the issuance of financial statements with GAAP departures. While once a very rare situation, this practice is becoming routine. It is surprising how willing creditors and other third-party users have become in accepting non GAAP financial statements.

It is obvious the value and importance placed on the preparation of GAAP based financial standards is rapidly eroding. Creditors and other third-party users appear to be very aware of the increasingly unreasonable, administrative burden being placed on their customers by standard setters. It is easy to imagine the development of loan agreements which allow borrowers to exclude the application of specific new standards in the preparation of financial statements to be submitted to lenders. These developments result in the diminution of the relevance of the standard setting process. Ultimately these developments will seriously undermine the value of the Independent Accountants' Report on the financial statements of nonpublic entities.

While the standard setters continue to find new and ever increasingly more complex and costly ways to serve the narrow interest of financial statement analysts for public issuers, they are undermining their relevance to the much larger group of nonpublic entities. This direction is not sustainable and is unsupportable in terms of its benefits versus the undue hardship and administrative costs placed on the nonpublic entity.

Financial Accounting Foundation

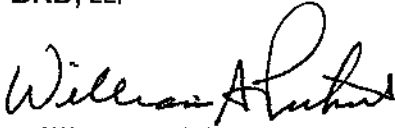
April 22, 2011

Page 2

Again, I urge the Trustee Working Group to support the full implementation of the recommendations made by the Blue Ribbon Panel on standard setting for nonpublic entities.

Sincerely

BKD, LLP

A handwritten signature in black ink, appearing to read "William A. Pickert". The signature is written in a cursive style with a large, looping initial "W".

William A. Pickert

WAP:ts