



June 28, 2011

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

Dear Sirs/Ma'ams:

I'm writing to ask you to adopt the recommendations made by the Blue Ribbon Panel on Private Company Financial Reporting regarding (1) differential standards and (2) a separate standard-setting entity for private companies. Differential standards and a standard-setting body independent of the FASB is necessary to effectively bring about sensible, useful financial reports for private companies and the users of their financial statements (such as bankers/lenders, insurers, venture capitalists and others).

I believe the current "one size fits all" system of a common set of standards for all companies is not at all appropriate, because the current standard-setting process doesn't take into account the needs of the private company sector (which are usually quite different from the needs of a public company). Consequently, there is an increasing lack of relevance of accounting standards for private companies and their financial statement users. Accounting standards have been and continue to be driven by issues affecting public companies which is fine for those companies, but does a disservice to private companies.

Private companies such as the one for which I work, do incur significant unnecessary costs for GAAP financial statement preparation and audit services, and it does not make sense to incur significant cost to comply with standards that have become increasingly irrelevant in the private company world.

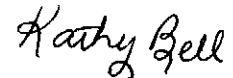
I also feel that a new, separate body with standard-setting authority must be established directly under FAF and not subject to FASB approval. I feel this way because, given the public company reporting pressures placed upon FASB, the board cannot adequately respond to the competing needs of the private company sector. FASB has never done an effective job in balancing the competing needs of both the public company and private company areas.

If you can only implement one recommendation from the blue ribbon panel, this would probably be the most important recommendation to implement. Without such a body, the differences needed in the standards are unlikely to occur, just like with past committees and efforts

The panel's report is based on a year of discussion, research efforts, and input from private companies and their financial statement users, among others. 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.

The bottom line is: differential standards and an autonomous standard-setting body to implement them for private companies are needed now. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Kathy Bell".

Kathy Bell
Manager