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**To:** [rdurak@aicpa.org](mailto:rdurak@aicpa.org)  
**Date:** 8/16/2011 12:08:34 PM  
**Subject:** Private Company Financial Reporting Web Site

While I appreciate that the AICPA supports creation of a Private Company Accounting Standards organization, in reviewing the web site, I do not see it a discussion of viewpoints that are different from the AICPA. I think it would be helpful to allow dissenting voices to be read, as well. I have sent letters and emails to AIPCA, FAF, and FASB expressing that I do not see yet another set of standards as serving to promote consistency and comparability. As a professional, it is incumbent that we exercise judgment in the application of accounting standards appropriate to the client's facts and circumstances. To blindly apply accounting standards as rule based mechanisms without exercising judgment is contrary to the lessons I have learned over years of education and practice. It is up to the professional CPA to discern the needs of the users of financial statements and the audience to which the information is directed to act as a guide in applying US GAAP to private companies.

As the profession moves toward a principle based approach to US GAAP, it is even more important that judgment be exercised appropriately and effectively in the preparation of private (and tax exempt) organizations. Creating yet another layer of "rules" is not what is needed at this (or any other time). In fact, we could do with fewer rules and improved guidance on what it means to use professional judgment and how to apply that skill to the preparation of financial statements for private (and tax exempt) entities.

Finally, as the US moves toward integration of accounting standards with IFRS, creating another independent set of standards would be counter productive and, more likely than not, interfere with the process of aligning US GAAP with IFRS.

I hope that the AICPA listens to the many sides of the arguments with respect to this new standard setting. I am opposed to moving forward on creating yet another set of standards at a time the profession is moving more toward principles and judgment.

Thank you,

Paul L. Shillam, CPA, CMA

PS Please feel free to pass this message along to others you believe should be aware.

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