



August 8, 2011

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:

As a preparer and user of private company financial statements, I am writing this letter to express my support for 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. Such historic change is necessary to effectively bring about meaningful financial statements for private companies and the users of their financial statements (such as bankers/lenders, insurers, venture capitalists and others).

I believe a systemic problem exists. The current standard-setting process does not adequately take into account the needs of the private company sector. Further, the panel was correct in that private companies are incurring significant unnecessary costs for GAAP financial statement preparation and audit, review or compilation services. As the COO of a community banking organization, I see this happening not only on the bank side, but also on the side of our customers.

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

Further, a new, separate body with standard-setting authority must be established directly under FAF and not subject to FASB approval. Given the public company reporting pressures placed upon FASB, the board cannot adequately respond to the competing needs of the private company sector.

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

Thank you.

A handwritten signature in black ink that reads "James G. DeBoeuf".

James G. DeBoeuf
Chief Operating Officer
563-355-2579
jdeboeuf@northwestbank.com

telephone 563.388.2511

mailing address P.O. Box 8001 Davenport, Iowa 52808-8001

www.northwestbank.com

100 E. Kimberly Road
Davenport, Iowa 52806

1454 W. Locust Street
Davenport, Iowa 52804

2550 Middle Road
Bettendorf, Iowa 52722

101 W. 2nd Street
Davenport, Iowa 52801

Member
FDIC

