



The Association of
Accountants and
Financial Professionals
in Business

May 29, 2015

Ms. Susan M. Cospers, Technical Director
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

Re: File Reference No. 2015-240, Exposure Draft of Proposed Accounting Standards Update (ASU) – *Revenue from Contracts with Customers: Deferral of the Effective Date*

Dear Ms. Cospers:

The Financial Reporting Committee (FRC) of the Institute of Management Accountants (IMA) is writing to share its views on the Financial Accounting Standards Board's (FASB) Exposure Draft of Proposed ASU – *Revenue from Contracts with Customers: Deferral of the Effective Date* (ED).

The IMA is a global association representing over 75,000 accountants and finance team professionals. Our members work inside organizations of various sizes, industries and types, including manufacturing and services, public and private enterprises, not-for-profit organizations, academic institutions, government entities and multinational corporations. The FRC is the financial reporting technical committee of the IMA. The committee includes preparers of financial statements for some of the largest companies in the world, representatives from the world's largest accounting firms, valuation experts, accounting consultants, academics and analysts. The FRC reviews and responds to research studies, statements, pronouncements, pending legislation, proposals and other documents issued by domestic and international agencies and organizations. Additional information on the FRC can be found at www.imanet.org in the Advocacy Activity section under the About IMA tab.

We support the one-year deferral of the effective date of Update No. 2014-09 – *Revenue from Contracts with Customers* for the reasons outlined in paragraph BC6 of the ED. We have members who are also members of the Transition Resource Group and through their insight, as well as the experience of our members, we appreciate the implementation issues that are being deliberated. We also note that the AICPA industry groups have not completed their reviews of potential implementation issues. The delay of one year allows time for these deliberations and analyses to be completed.

We also support the International Accounting Standards Board's proposal to defer the effective date Update to International Financial Reporting Standard 15, *Revenue from Contracts with Customers*, for one year for the same reasons and encourage the Boards to keep the standards converged.

Further, we support the FASB proposal to permit application of Update No. 2014-09 as of December 15, 2016, the original effective date. This provision allows those entities prepared to adopt Update No. 2014-09 to proceed as planned. Also, the FASB proposal in conjunction with the IASB proposal allows entities subject to both standards to adopt on the same timeline.

We would be pleased to discuss our comments with the Board or the FASB staff at your convenience.

Sincerely,

A handwritten signature in blue ink that reads "N. Schroeder".

Nancy J. Schroeder, CPA
Chair, Financial Reporting Committee
Institute of Management Accountants
nancy@beaconfinancialconsulting.com

cc: Mr. Harry Rees, IASB, Technical Director