

December 20, 2019

Mr. Shayne Kuhaneck  
Acting Technical Director  
Financial Accounting Standards Board  
401 Merritt 7  
P.O. Box 5116  
Norwalk, CT 06856-5116

By e-mail: [director@fasb.org](mailto:director@fasb.org)

**Re: Proposed Accounting Standards Update—Codification Improvements**

**(File Reference No. 2019-800)**

Dear Mr. Kuhaneck:

The New York State Society of Certified Public Accountants (NYSSCPA), representing more than 23,000 CPAs in public practice, business, government and education, welcomes the opportunity to comment on the above-captioned exposure draft.

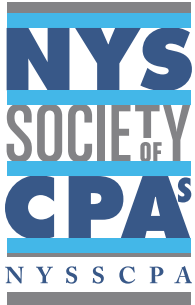
The NYSSCPA's Financial Accounting Standards Committee deliberated the proposed accounting standards update and prepared the attached comments. If you would like additional discussion with us, please contact Jeffrey A. Keene, Chair of the Financial Accounting Standards Committee, at (732) 750-0900, or Ernest J. Markezin, NYSSCPA staff, at (212) 719-8303.

Sincerely,

A handwritten signature in black ink that reads "Ita M. Rahilly". The signature is written over a faint, semi-transparent watermark of the NYSSCPA logo.

Ita M. Rahilly  
President

Attachment



**NEW YORK STATE SOCIETY OF  
CERTIFIED PUBLIC ACCOUNTANTS**

**COMMENTS ON  
PROPOSED ACCOUNTING STANDARDS UPDATE—CODIFICATION  
IMPROVEMENTS**

**(File Reference No. 2019-800)**

**December 20, 2019**

**Principal Drafters**

**Jeffrey A. Keene  
John J. McEnerney  
Sean C. Prince  
Robert M. Rollmann**

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Keith Lazarus  
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# New York State Society of Certified Public Accountants

## Comments on

### Proposed Accounting Standards Update—Codification Improvements

We welcome the opportunity to respond to the Financial Accounting Standards Board's (FASB or the Board) invitation to comment on Proposed Accounting Standards Update—Codification Improvements (proposed Update). Our responses to the Questions for Respondents are presented below.

**Question 1:** Do you agree with the amendments to the Codification in this proposed Update? If not, please explain which proposed amendment(s) you disagree with and why.

**Response:** We agree.

**Question 2:** Would any of the proposed amendments result in substantive changes to the application of existing guidance that would require transition provisions? If so, please describe.

**Response:** We do not believe any of the proposed amendments will require transition provisions.

**Question 3:** Would the proposed amendment to Topic 805, Business Combinations (Issue 10), affect your assessment of liabilities assumed in a business combination?

**Response:** We do not expect that the proposed amendment will affect the assessment of liabilities assumed in a business combination. The proposed amendment clarifies that obligations that are liabilities under Topic 480 are included in liabilities assumed in a business combination. Under current guidance, we believe that reporting entities are including these obligations as part of liabilities assumed.

**Question 4:** The proposed amendments related to Issue 37 would be effective immediately. Do you have any concerns with that and, if so, why? Can you apply the guidance on a modified retrospective basis if you already have adopted the amendments in Accounting Standards Update No. 2017-08, *Receivables—Nonrefundable Fees and Other Costs (Subtopic 310-20): Premium Amortization on Purchased Callable Debt Securities*? Do you agree with the transition disclosures? If not, please explain why.

**Response:** We do not have any concerns related to the immediate effectiveness of the proposed amendments related to Issue 37. We believe you can apply modified retrospective guidance if ASU 2017-08 has already been adopted. We agree with the transition disclosures.

**Question 5:** For entities that have adopted the amendments in Accounting Standards Update No. 2016-13, *Financial Instruments—Credit Losses (Topic 326): Measurement of Credit Losses on Financial Instruments*, the proposed amendments related to Issues 38 and 49 would be effective

immediately. Do you have any concerns with that and, if so, why? Do you agree with the transition disclosures? If not, please explain why.

**Response:** We have no concerns with Issues 38 and 49 being effective immediately. We agree with the transition disclosures.

**Question 6:** Are there other changes that should be made that are directly or indirectly related to the proposed amendments?

**Response:** We do not believe there are other changes that should be made that are directly or indirectly related to the proposed amendments.

**Question 7:** The proposed amendments would apply to public and nonpublic entities. Would any of the proposed amendments require special consideration for nonpublic entities? If so, which proposed amendment(s) would require special consideration and why?

**Response:** We do not believe any of the proposed amendments require special considerations for nonpublic entities.