

May 23, 2011

Technical Director
Financial Accounting Standards Board
Sent via email to: director@fasb.org

Re: File Reference No. 2011-180
Intangibles—Goodwill and Other (Topic 350)

The Accounting Principles and Auditing Standards Committee (“the Committee” or “We”) of the California Society of Certified Public Accountants (“CalCPA”) is pleased to provide our comments to the Financial Accounting Standards Board (the “Board”) on the proposed Accounting Standards Update.

The Committee is the senior technical committee of CalCPA. CalCPA has approximately 35,000 members. The Committee is comprised of 50 members, of whom 67 percent are from local or regional firms, 23 percent are sole practitioners in public practice, 5 percent are in industry and 5 percent are in academia.

Question 1: Please describe the entity or individual responding to this request.

See discussion above.

Question 2: For preparers, do you believe that the proposed amendments will reduce overall costs and complexity compared with existing guidance? If not, please explain why.

Not applicable.

Question 3: For preparers, do you expect your entity will choose to perform the qualitative assessment proposed in the amendments, or will your entity choose to proceed directly to performing the first step of the two-step impairment test? Please explain.

Not applicable.

Question 4: For auditors, do you believe that the proposed amendments will reduce overall costs and complexity compared with existing guidance? If not, please explain why. Does your response differ based on whether the entity is public or nonpublic?

We believe costs and the complexity will be reduced for many public and private entities by the proposed amendments.

Question 5: For users, do you believe that the qualitative approach for testing goodwill for impairment will delay the recognition of goodwill impairment losses or affect how you evaluate goodwill reported in the financial statements? If yes, please explain.

We do not believe that impairment losses will be delayed as a result of the proposed changes.

Question 6: Do you agree that the proposed examples of events and circumstances to be assessed are adequate? If not, what changes do you suggest?

Yes, we believe the examples are adequate.

Question 7: Do you agree that the guidance in the proposed amendments about how an entity should assess relevant events or circumstances is clear? If not, how can the guidance be improved?

We believe the guidance is sufficient for how events or circumstances should be assessed.

Question 8: Do you agree with the Board's decision to make the proposed amendments applicable to both public entities and nonpublic entities? If not, please explain why.

Yes. It is a practical and common sense approach to an accounting issue for any entity, public or private.

Question 9: Do you agree with the proposed effective date provisions? If not, please explain why.

Yes.

We would be glad to discuss our comments further should you have any questions or require additional information.

Very truly yours,

A handwritten signature in black ink that reads "Howard Sibel". The signature is written in a cursive, flowing style.

Howard Sibelman, Chair
Accounting Principles and Auditing Standards Committee
California Society of Certified Public Accountants