

September 22, 2014

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

By e-mail: director@fasb.org

Re: Proposed Accounting Standards Update—*Income Statement – Extraordinary and Unusual Items (Subtopic 225-20): Simplifying Income Statement Presentation by Eliminating the Concept of Extraordinary Items*

File Reference No. 2014-220

Dear Ms. Cospers:

The New York State Society of Certified Public Accountants (NYSSCPA), representing more than 28,000 CPAs in public practice, business, government and education, welcomes the opportunity to comment on the above captioned exposure draft.

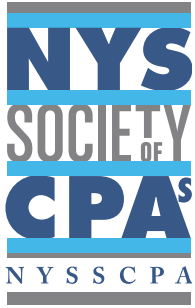
The NYSSCPA's Financial Accounting Standards Committee deliberated the proposed accounting standards update and prepared the attached comments. If you would like additional discussion with us, please contact Robert M. Rollmann, Chair of the Financial Accounting Standards Committee at (914) 421-5605, or Ernest J. Markezin, NYSSCPA staff, at (212) 719-8303.

Sincerely,

A handwritten signature in black ink, appearing to read "S. M. Adair". The signature is written over a faint, light blue watermark of the NYSSCPA logo.

Scott M. Adair
President

Attachment



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

COMMENTS ON

**PROPOSED ACCOUNTING STANDARDS UPDATE—*INCOME STATEMENT—
EXTRAORDINARY AND UNUSUAL ITEMS (SUBTOPIC 225-20): SIMPLIFYING
INCOME STATEMENT PRESENTATION BY ELIMINATING THE CONCEPT OF
EXTRAORDINARY ITEMS***

FILE REFERENCE NO. 2014-220

September 22, 2014

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**Agwu Agwu
Kenneth Bosin
Jo Ann Golden**

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NYSSCPA Staff

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New York State Society of Certified Public Accountants

Comments on

Proposed Accounting Standards Update—*Income Statement – Extraordinary and Unusual Items (Subtopic 225-20): Simplifying Income Statement Presentation by Eliminating the Concept of Extraordinary Items*

File Reference No. 2014-210

We welcome the opportunity to comment on the Financial Accounting Standards Board's (the Board) Exposure Draft of a Proposed Accounting Standards Update— *Income Statement – Extraordinary and Unusual Items (Subtopic 225-20): Simplifying Income Statement Presentation by Eliminating the Concept of Extraordinary Items* (proposed Update).

General Comments

We are pleased that the Board has taken steps to simplify the financial statement presentation by proposing the elimination of the concept of extraordinary items. With the concept of unusual or infrequently occurring items retained in the standards, the reporting entity has presentation and disclosure guidance. We believe that the proposed guidance will improve financial reporting and reduce costs for all companies when unusual or infrequent events or transactions occur.

Responses to Questions for Respondents

Question 1: Should the concept of extraordinary items be eliminated from GAAP? If not, why not?

Response: We concur with the Board supporting the elimination of the concept of extraordinary items from GAAP.

Question 2: Should the proposed Update be applied prospectively to extraordinary items occurring after the date of adoption?

Response: Yes. However, as reporting entities generally present comparative financial statements, the disclosure in the prospective reporting should include an explanation of any effects the change of a previously separately classified extraordinary item has if it is now included in income from continuing operations.

Question 3: Should the proposed Update be effective in annual periods, and interim periods within those annual periods, beginning after December 15, 2015, with early adoption permitted? Should there be a delay in the effective date for entities other than public business entities and why?

Response: We agree that the effective date should be for years beginning after December 15, 2015 with early adoption permitted. We do not believe there should be a delay in the effective date for entities other than public business entities as the financial impact is reduced and the reporting would be simplified.