

June 12, 2018

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

By e-mail: director@fasb.org

**Re: Proposed Accounting Standards Update—*Collaborative Arrangements (Topic 808):
Targeted Improvements***


(File Reference No. 2018-240)

Dear Ms. Cospers:

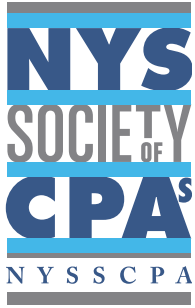
The New York State Society of Certified Public Accountants (NYSSCPA), representing more than 26,000 CPAs in public practice, business, government and education, welcomes the opportunity to comment on the above-captioned exposure draft.

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 Margaret A. Wood, Chair of the Financial Accounting Standards Committee, at (201) 401-7844, or Ernest J. Markezin, NYSSCPA staff, at (212) 719-8303.

Sincerely,


NYSSCPA
Jan C. Herringer
President

Attachment



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

**COMMENTS ON
PROPOSED ACCOUNTING STANDARDS UPDATE—*COLLABORATIVE
ARRANGEMENTS (TOPIC 808): TARGETED IMPROVEMENTS***

(File Reference No. 2018-240)

June 12, 2018

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New York State Society of Certified Public Accountants

Comments on

Proposed Accounting Standards Update—*Collaborative Arrangements (Topic 808): Targeted Improvements*

(File Reference No. 2018-240)

General Comments

We welcome the opportunity to respond to the Financial Accounting Standards Board's (FASB or the Board) invitation to comment on the Proposed Accounting Standards Update—*Collaborative Arrangements (Topic 808): Targeted Improvements* (proposed Update).

We are pleased that the Board has taken action to clarify the interaction between Topic 808 and Topic 606 – Revenue from Contracts with Customers. Overall, we agree with the proposed Update. Our detailed responses to the Questions for Respondents are presented below.

Specific Comments

Question 1: Would the amendments in this proposed Update clarify when a transaction between collaborative participants is within the scope of the revenue guidance in Topic 606? Would the proposed amendments reduce diversity in practice in this area? If not, please explain why.

Response: We agree that the proposed Update clarifies when a transaction between collaborative participants is within the scope of the revenue guidance in Topic 606 and we believe the proposed amendments will reduce diversity in practice in this area.

Question 2: Is additional guidance necessary to determine whether a collaborative participant is a customer? If so, please provide suggestions.

Response: We do not believe additional guidance is required.

Question 3: Are the proposed amendments on presentation in paragraph 808-10-45-3 operable? Would the proposed amendments reduce diversity in practice in this area?

Response: The proposed amendments are operable and will reduce diversity in practice.

Question 4: Would the proposed amendments on the unit of account clarify that the unit-of-account guidance in Topic 606 should be applied for determining if a transaction is within the scope of Topic 606? If not, please explain why.

Response: Yes, the proposed amendments on the unit-of-account would provide clarification.

Question 5: Should a reporting entity be required to provide additional recurring disclosures (that is, incremental disclosures to those required in Topic 808 and Topic 606) because of the proposed amendments? If so, what additional recurring disclosures should be required?

Response: We do not believe disclosures incremental to those required by Topic 808 and Topic 606 are required.

Question 6: Do you agree with the proposed transition requirements, including the retrospective application to the adoption date of Topic 606? If not, what transition method would be more appropriate and why?

Response: We agree with the proposed transition requirements, including the retrospective application to the adoption date of Topic 606.

Question 7: How much time is needed to implement the proposed amendments? Should early adoption be permitted?

Response: The amount of time to implement the proposed amendments will vary based on the nature and complexity of the underlying collaboration agreements. Since the proposed amendments are tied to Topic 606, we believe adoption should be no earlier than an entity's adoption of Topic 606.

Question 8: Should entities other than public business entities be provided with more time to implement the proposed amendments? If so, how much more time?

Response: We believe that entities other than public business entities should be provided more time. That time should be at least one year more, with early adoption permitted, but no sooner than the other public business entities' adoption of Topic 606.