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CERTIFIED PUBLIC ACCOUNTANTS

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Financial Accounting Standards Board
Technical Director—File Reference 1310-100
401 Merritt 7
PO Box 5116
Norwalk, Connecticut 06856-5116

Re: Proposal No. 1310-100

I am writing to comment on the invitation to comment referenced above. I am most happy to see that the differences of the needs between public and private company users and readers are being considered.

I believe that the process described in paragraphs 16-29 is definitely a step in the right direction. It may have to be modified somehow along the way, but I think that the need for improvement is necessary and that we have to start somewhere.

I agree totally with the thought that any differences in generally accepted accounting principles should be based on financial statement user needs and cost-benefit considerations. A financial statement is a communication tool and should be designed to inform those desiring the information instead of confusing or overwhelming them. We may even find that certain disclosures etc. might be necessary in the private world that are not necessary in the public arena, so this may not always lead to less accounting or disclosure for the private company. However, once again the end user is the one that should be considered in the decision.

I agree that committee members should not be compensated beyond expenses, and I believe that private company practitioners are so hungry for this change that there will not be a problem in securing committee members without compensation.

I also believe that the committee should set its own agenda and priorities since as representatives of the private company sector; they know better than anyone else where the biggest issues, problems and ineffective accounting costs are.

I am very much in support of the ideas proposed in the invitation to comment, and hope that both the FASB and the AICPA will support the ideas and make them a reality.

Sincerely,

Lisa E. McIntosh, CPA
Member in Charge of Audit