

October 15, 2015

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

File Reference No. 2015-290

The Accounting Principles Committee of the Illinois CPA Society (Committee) appreciates the opportunity to provide its perspective on the Proposed Accounting Standards Update, Revenue from Contracts with Customers (Topic 606) – Principal versus Agent Considerations (Reporting Revenue Gross versus Net). The Committee supports the proposed guidance, and believes the amendments will enhance the operability of the new revenue recognition standard, and are responsive to implementation issues identified by the Transition Resource Group and others.

A principal versus agent analysis often involves considerable judgment, and it is our view that the proposed amendments will promote consistent application of the principal versus agent guidance. In addition, we believe the amendments will reduce the cost and complexity of implementing the guidance in Topic 606.

We commend the Board on its efforts to timely address implementation issues associated with this major standard setting project, and encourage the Board to continue identifying issues and promulgating clarifying amendments as necessary.

We appreciate the opportunity to offer our comments.

Sincerely,

Scott G. Lehman, CPA

Chair, Accounting Principles Committee

Ryan Brady, CPA

Vice Chair, Accounting Principles Committee

APPENDIX A

ACCOUNTING PRINCIPLES COMMITTEE ORGANIZATION AND OPERATING PROCEDURES 2015-2016

The Accounting Principles Committee of the Illinois CPA Society (Committee) is composed of the following technically qualified, experienced members appointed from industry, education and public accounting. These members have Committee service ranging from newly appointed to more than 20 years. The Committee is an appointed senior technical committee of the Society and has been delegated the authority to issue written positions representing the Society on matters regarding the setting of accounting standards. The Committee's comments reflect solely the views of the Committee and do not purport to represent the views of their business affiliations.

The Committee usually operates by assigning Subcommittees of its members to fully study and discuss exposure documents proposing additions to or revisions of accounting standards. The Subcommittee ordinarily develops a proposed response that is considered, discussed and voted on by the full Committee. Support by the full Committee then results in the issuance of a formal response, which at times includes a minority viewpoint. Current members of the Committee and their business affiliations are as follows:

Public Accounting Firms:

Large: (national & regional)

Ryan Brady, CPA (Vice Chair) Grant Thornton LLP
John Hepp, CPA Grant Thornton LLP

David Jamiolkowski, CPA Baker Tilly Virchow Krause, LLP

William Keirse, CPA Ernst & Young LLP
Scott Lehman, CPA (Chair) Crowe Horwath LLP

Reid Mitchell, CPA Wipfli LLP
Elizabeth Prossnitz, CPA BDO USA LLP

Medium: (more than 40 professionals)

Timothy Bellazzini, CPA Sikich LLP

Christopher Cameron, CPAKutchins Robbins & Diamond LtdMichael Kidd, CPAMowery & Schoenfeld LLCMatthew Mitzen, CPAFrost Ruttenberg & Rothlatt PC

Krunal Shah, CPA Mitchell & Titus LLP

Jeffery Watson, CPA Miller Cooper & Company Ltd

Small: (less than 40 professionals)

Peggy Brady, CPA Selden Fox, Ltd.

Marvin Hoffman, CPA Bronswick, Reicin, Pollack, Ltd.

Brian Kot, CPA Cray Kaiser Ltd CPAs
Joshua Lance, CPA Joshua Lance CPA, LLC

Industry:

Rose Cammarata, CPA CME Group Inc.

Anand Dalal, CPA Toji Trading Group LLC

Ashlee Earl, CPA Seaway Bank and Trust Company

Jeffrey Ellis, CPA FTI Consulting, Inc.

Farah Hollenbeck, CPA Abbvie

Marianne Lorenz, CPA

Michael Maffei, CPA

Ying McEwen, CPA

Anthony Peters, CPA

Martin Ross, CPA

Amanda Rzepka, CPA

Richard Tarapchak, CPA

AGL Resources Inc.

GATX Corporation

Martin Case New Holland

McDonald's Corporation

Riveron Consulting LP

Jet Support Services, Inc.

National Material

Staff Representative:

Gayle Floresca, CPA Illinois CPA Society