

November 2, 2020

Technical Director

Financial Accounting Standards Board

401 Merritt 7, P.O. Box 5116

Norwalk, CT 06856-5116

File Reference No. 2020-600

The Accounting Principles Committee of the Illinois CPA Society (“Committee”) appreciates the opportunity to provide its perspective on the *Proposed Accounting Standards Update, Franchisors – Revenue from Contracts with Customers (Subtopic 952-606)* (herein referred to as the “Update”).The Committee is a voluntary group of CPAs from public practice, industry and education. Our comments represent the collective views of the Committee members and not the individual views of the members or the organizations with which they are affiliated. The organization and operating procedures of the Committee are outlined in Appendix A to this letter.

The Committee applauds the efforts of the FASB to improve the implementation of Topic 606 and reduce the cost and complexity of applying Topic 606 to identifying performance obligations. However, we do not support introducing guidance for franchisors as outlined in the proposed Update for the reasons cited by Ms. Botosan and Messrs. Buesser and Schroeder in the *Alternative Views* section of the Update. Our Committee believes the Update provides an exception to Topic 606 for non-public franchisors as opposed to introducing a practical expedient. Accordingly, the Update would only reintroduce industry-specific guidance to the accounting for revenue that ASU 2014-09, *Revenue from Contracts with Customers*, was intended to eliminate. Significant cost and complexity in identifying performance obligations relating to pre-opening services under a franchise agreement is not an issue which is unique to franchisors. As acknowledged by the Board in paragraph BC30, other industries may provide upfront services or collect upfront fees and face difficulties, like franchisors, in accounting for these activities. The Committee recommends the Board consider, in lieu of this Update, modifications to step 2 in Topic 606 on how performance obligations are identified that would apply to all reporting entities.

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We appreciate the opportunity to provide our comments and observations on the proposed Update and would be pleased to discuss them with the Board members or the FASB staff at your convenience.

Sincerely,

**William Keirse, CPA**
Chair, Accounting Principles Committee

**Matt Mitzen, CPA**
Vice Chair, Accounting Principles Committee

APPENDIX A

ACCOUNTING PRINCIPLES COMMITTEE

ORGANIZATION AND OPERATING PROCEDURES

2020-2021

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 Grant Thornton LLP

 Ashley Carboni, CPA KPMG LLP

 Michael Couillard, CPA Baker Tilly Virchow Krause LLP

 Matthew Denton, CPA Sikich LLP

 Jason Eaves, CPA Crowe LLP

 William Keirse, CPA (Chair) Ernst & Young LLP

 Melissa Lynch, CPA Plante Moran, PLLC

 Jason Plourde, CPA Grant Thornton LLP

 Darshana Raigaga, CPA BKD LLP

 David Wentzel, CPA Crowe LLP

**Medium:** (more than 40 professionals)
Danielle Martin, CPA Porte Brown LLC
Jeffery Watson, CPA Miller Cooper & Company Ltd

**Small:** (less than 40 professionals)
Peggy Brady, CPA Selden Fox, Ltd.
Brian Kot, CPA Cray Kaiser Ltd CPAs

Matthew Mitzen, CPA (Vice Chair) Bronswick Benjamin P.C.

**Educators:**

 Mollie Adams, CPA Bradley University

 John Hepp, CPA University of Illinois at Urbana-Champaign

**Industry:**

 John Bercerril, CPA Elkay Manufacturing

 Jeffrey Ellis, CPA FTI Consulting, Inc.

 Michael Maffei, CPA GATX Corporation

Thomas Masterson, CPA Medix

Elizabeth Prossnitz, CPA Consultant

Lisa Sezonov, CPA Northern Trust

Richard Tarapchak, CPA Reynolds Group Holdings

William Wang, CPA Union Tank Car Company

Daniel Wilfong, CPA Ansira, Inc.

**Staff Representative:** Rafael Wiesenberg, CPA Illinois CPA Society