



October 29, 2010

**VIA ELECTRONIC MAIL**

Russell G. Golden  
Technical Director  
File Reference No. 1820-100  
Financial Accounting Standards Board  
401 Merritt 7  
PO Box 5116  
Norwalk, CT 06856-5116  
Electronic Address: [director@fasb.org](mailto:director@fasb.org)

Re: Revenue Recognition (Topic 605), Revenue from Contracts with Customers

Dear Mr. Golden:

The Office of Advocacy (Advocacy) is submitting this comment in response to the Financial Accounting Standards Board (FASB) Exposure Draft of a proposed Accounting Standards Update of Topic 605, File Reference No. 1820-100. Advocacy is concerned that the Exposure Draft would have negative consequences for small businesses.

Advocacy was established pursuant to P.L. 94-305 to represent the views of small business before Federal agencies and Congress.<sup>1</sup> Advocacy is an independent office within SBA, so the views expressed by Advocacy do not necessarily reflect the views of the SBA or the Administration.

On October 20, 2010, Advocacy staff participated in a conference call with FASB staff responsible for drafting the Exposure Draft. During the call, Advocacy conveyed to FASB staff the various concerns of small businesses that the Exposure Draft, if finalized, would negatively impact small businesses. FASB assured Advocacy that the process to finalize the Exposure Draft would be open and transparent to the public, and that FASB would take into account the concerns of small businesses during this process. Advocacy commends FASB for participating in the conference call. Advocacy looks forward to working with FASB during this process to minimize the burdens of Exposure Draft on small businesses.

We appreciate FASB staff taking the time to talk with Advocacy to discuss the concerns of small business regarding the Exposure Draft. If you have any questions or require additional information please contact Assistant Chief Counsel for Dillon Taylor at (202) 401-9787 or by email at [Dillon.Taylor@sba.gov](mailto:Dillon.Taylor@sba.gov).

Sincerely,

Winslow Sargeant, Ph.D.  
Chief Counsel for Advocacy

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<sup>1</sup> 5 U.S.C. § 634a (1976). [http://www.sba.gov/advo/laws/law\\_sta.html#634a](http://www.sba.gov/advo/laws/law_sta.html#634a).