

October 19, 2017

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](mailto:director@fasb.org)

**Re: Proposed Accounting Standards Update—Leases (Topic 842): Land Easement Practical Expedient for Transition to Topic 842**

**(File Reference No. 2017-290)**

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.

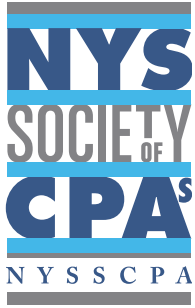
The NYSSCPA's Financial Accounting Standards Committee deliberated the proposed accounting standards update and prepared the attached comments. If you would like additional discussion with us, please contact Margaret A. Wood, Chair of the Financial Accounting Standards Committee, at (201) 401-7844, or Ernest J. Markezin, NYSSCPA staff, at (212) 719-8303.

Sincerely,

A handwritten signature in black ink that reads "Harold L. Deiters III". The signature is written in a cursive style and is positioned over a faint, light blue watermark of the NYSSCPA logo.

Harold L. Deiters III  
President

Attachment



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

**COMMENTS ON  
PROPOSED ACCOUNTING STANDARDS UPDATE—*LEASES (TOPIC 842): LAND  
EASEMENT PRACTICAL EXPEDIENT FOR TRANSITION TO TOPIC 842***

**(File Reference No. 2017-290)**

**October 19, 2017**

**Principal Drafter**

**Margaret A. Wood**

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Ernest J. Markezin

**New York State Society of Certified Public Accountants**

**Comments on**

**Proposed Accounting Standards Update—*Leases (Topic 842): Land Easement Practical Expedient for Transition to Topic 842***

**(File Reference No. 2017-290)**

**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—*Leases (Topic 842): Land Easement Practical Expedient for Transition to Topic 842* (proposed Update).

We agree with the Board's proposal to provide clarification that land easements are to be assessed using Topic 842 Leases. This will eliminate the current differences that occur in GAAP. We also agree with the Board's proposal to provide relief to and permit prospective adoption of Topic 842 for the accounting for land easements for those companies that did not use Topic 840 Leases to assess land easements in the past.

**Specific Comments**

We have the following responses to questions posed in the proposed Update.

**Question 1: Would the land easement practical expedient in this proposed Update reduce the cost and complexity to implement Topic 842? If not, please explain why.**

**Response:** We agree that the land easement practical expedient in this proposed Update should reduce the cost and complexity to implementing Topic 842 as it relates to land easements.

**Question 2: Would the proposed amendments require transition provisions or an effective date that is different from those for Topic 842? If yes, please explain what transition requirements and/or effective date you would recommend and why.**

**Response:** The transition provisions and effective date should be the same as Topic 842.