



Project	Conceptual Framework – Reporting Entity (Phase D)
Topic	Comment Period for the Forthcoming Exposure Draft

Introduction

1. At the March 2009 IASB Board meeting and at the 2 April 2009 FASB Board meeting, the Boards respectively directed the staff to commence drafting an Exposure Draft on the Reporting Entity Chapter of the Conceptual Framework. The purpose of this paper is to ask the Boards to decide on the length of the comment period for this Exposure Draft. The staff recommendation is 120 days.

Guidance to Determine Comment Periods

2. Paragraph 98 of the IASB Due Process Handbook says:

The IASB normally allows a period of 120 days for comment on its consultation documents. For exposure drafts, if the matter is exceptionally urgent, the document is short, and the IASB believes that there is likely to be a broad consensus on the topic, the IASB may consider a comment period of no less than 30 days. For major projects, the IASB will normally allow a period of more than 120 days for comments. ...

3. The FASB Reference Manual (revised April 2009) says:

At its public meetings, the Board discusses and reaches decisions on the comment period for a due process document to be issued for public comment subject to formal approval by the Board (vote by written ballot), that is, a Discussion Paper of preliminary views or an Exposure Draft. That decision usually is made when the Board authorizes the staff to proceed to a ballot draft of the document. The FASB Rules of Procedure specify that comment periods generally should not be less than 30 days. ...

Determining the appropriate comment period requires judgment. However, in all cases, the comment period should be sufficient to allow respondents time to evaluate the proposal, considering the time of the year covered by the comment period, the complexity of the proposal, the types of entities likely to be affected by the proposal, and

This paper has been prepared by the technical staff of the IASB for the purposes of discussion at a public meeting of the IASB.

The views expressed in this paper are those of the staff preparing the paper and do not purport to represent the views of any individual members of the Board or the IASB.

Decisions made by the Board are reported in IASB *Update*.

Official pronouncements of the IASB are published only after the Board has completed its full due process, including appropriate public consultation and formal voting procedures.

IASB Staff paper

the urgency of FASB action. In considering comment periods, some general guidelines follow:

Concepts 60-180 days

...

Staff Recommendation

4. The staff recommends a comment period of 120 days because 120 days is the normal comment period for the IASB and also meets the general guidelines for the FASB's comment period.
5. At the May 2009 IASB Board meeting, the IASB staff working on the consolidation project will be recommending that the completion date for the consolidation project and the derecognition project be aligned. If the IASB agrees with this staff recommendation, the staff thinks it is possible to publish the final Chapter on the Reporting Entity when or before the IFRS on consolidation is published.

Question for the Boards

Should the comment period for the forthcoming Exposure Draft of the Reporting Entity Chapter of the Conceptual Framework be 120 days? If not, how long should it be?