

From: [Gk Chinoy](#)
To: [Comments](#)
Subject: Re: ACCOUNTING ESTIMATES AND FAIR VALUE MEASUREMENTS
Date: Saturday, November 01, 2014 4:50:45 PM

Dear Sir/Ma'am:

As a retired CPA I wish to offer the following comments on the subject:

1. We have experienced accounting scandals in the U.S., the root causes of these are (a) greed-driven management decision-making, and (b) lax regulations
2. Each time the regulations are tightened the entrepreneurial management lobbyists * fight tooth-and-nail, and seek relaxation on grounds of reviving the economy or some other pretext.
3. Or, when new or emerging issues, such as the subject, are considered, their * tactics are the same.
4. As regards the current subject, we need to keep in mind past history when developing future regulations, and remember that entrepreneurial management will always find ways to skirt around the regulations.

Hence my suggestion is: consider inserting a clause in the proposed rules to hold them (entrepreneurial management) accountable for the consequences of their decision to use estimates and fair value measurements, regardless of disclaimers and caveats in disclosure notes, etc..

Best regards

Dr. G. K. Chinoy FCA CPA