



October 31, 2012

Mr. Peter Martin, CA
Director, Accounting Standards
Accounting Standards Board
277 Wellington Street West
Toronto, ON M5V 3H2

Re: AcSB Exposure Draft – Discontinued Operations, July 2012

Dear Mr. Martin:

The Committee on Corporate Reporting of Financial Executives International Canada (FEI Canada) is responding to the Accounting Standards Board's proposed accounting standards for private enterprises and not-for-profit organizations on discontinued operations. We appreciate the opportunity to provide comments.

FEI Canada is the all-industry professional membership association for senior financial executives. With eleven chapters across Canada and more than 1,800 members, FEI Canada provides professional development, thought leadership and advocacy services to its members. The association membership, which consists of Chief Financial Officers, Audit Committee Directors and senior executives in the Finance, Controller, Treasury and Taxation functions, represents a significant number of Canada's leading and most influential corporations.

The Committee on Corporate Reporting (CCR) is one of two national advocacy committees of FEI Canada. CCR comprises more than 25 senior financial executives representing a broad cross-section of the FEI membership and of the Canadian economy who have volunteered their time, experience and knowledge to consider and recommend action on a range of issues related to accounting, corporate reporting and disclosure. In addition to advocacy, CCR is devoted to improving the awareness and educational implications of the issues it addresses, and is focused on continually improving the standards and regulations impacting corporate reporting.

The CCR supports the Accounting Standards Board's proposed accounting standards for private enterprises and not-for-profit organizations on discontinued operations. We are in agreement with the proposal to raise the threshold for a disposal to be classified as a discontinued operation. The Accounting Standards Board's view that the proposed standard would lead to fewer disposals qualifying as discontinued operations is consistent with that of ours. In addition, we believe that it is important to achieve alignment in this area with the definition of discontinued operations in IFRS 5 *Non-current Assets Held for Sale and Discontinued Operations* in Part I of the Handbook.

Thank you for allowing us the opportunity to respond to this proposal.

Yours very truly,

Gordon Heard
Chair
Committee on Corporate Reporting
FEI Canada