

Linda Feeney

From: UKFRS
Subject: Proposed revisions to FRS 102

From: UKFRS
Sent: 02 November 2016 09:29
To: ukfrsreview <ukfrsreview@frc.org.uk>
Subject: Fw: Proposed revisions to FRS 102

From: Terry Dryburgh <terry.dryburgh@shorts.uk.com>
Sent: 27 September 2016 16:31
To: UKFRS
Subject: Proposed revisions to FRS 102

Dear Sirs,

I have nothing to say re the proposed revisions, but I would like to suggest two more:

- a) Investment properties: reinstate the exemption included in SSAP19 for properties used within a group for the purpose of the group's business. It is nonsensical for a holding company which lets out properties to its subsidiaries to have to treat those assets as investment properties in its own accounts, but then have to unwind all that for the consolidated accounts.
- b) Introduce an exemption for long-term intra-group debt that is not at a market rate of interest from the requirement to have market rate foisted upon it for accounting purposes, bringing in strange debits and credits in Investment in Subsidiaries and Capital Contributions within equity.

Yours faithfully,

Terry Dryburgh



Terry Dryburgh
Senior Accounts Manager

DDI : 01246 541 481

SHORTS

2 Ashgate Road | Chesterfield | S40 4AA | T: 01246 559955

Cedar House | 63 Napier Street | Sheffield | S11 8HA | T: 0114 2671617

www.shorts.uk.com

