

EFRAG
Attn. EFRAG Technical Expert Group
35 Square de Meeûs
B-1000 Brussels
Belgique

Our ref : RJ-EFRAG 568 B
Date : Amsterdam, 26 October 2015
Re : Comment on your draft comment letter regarding the
IASB Exposure Draft ED/2015/6 Clarifications to IFRS 15

Dear members of the EFRAG Technical Expert Group,


The Dutch Accounting Standards Board (DASB) appreciates the opportunity to respond on your draft comment letter on ED/2015/5 Clarifications to IFRS 15.

We believe that it is an important step forward that convergence between IFRS and US GAAP is realised on the principles of revenue recognition. We agree with the position of the IASB that IFRS 15 should be principles-based. As a consequence, we also support that the IASB made the decision not to clarify certain issues where the FASB has decided to provide further guidance. Additionally, we do not believe that convergence on guidance and examples to IFRS 15 should be a goal in itself. Therefore, we do not concur with your tentative view that the TRG should continue to operate as kind of interpretation group. We are afraid that this will result in even more guidance and a less principles-based standard.

Nevertheless, we do not object to the clarifications to IFRS 15 currently proposed by the IASB. Although we do believe that in the near future a 'stable platform' for IFRS 15 is very important, as many companies are currently preparing for implementation, the proposed clarifications are useful. However, no further changes to IFRS 15 should be made unless major issues come to light.

Furthermore, we agree with your comments relating to the individual questions in the ED. Therefore, we have decided to refer to your draft comment letter in our comment letter to the IASB.

Yours sincerely,



prof. dr. Peter Sampers
Chairman Dutch Accounting Standards Board