

October 26, 2015

Mr. Hans Hoogervorst, Chairman  
International Accounting Standards Board  
30 Cannon Street, London EC4M 6XH  
United Kingdom

Dear Mr. Hoogervorst,

**Re: Exposure Draft ED/2015/6 Clarifications to IFRS 15**

The Financial Accounting Issues Task Force of the Taiwan Financial Reporting Standards Committee (TFRSC) of Accounting Research and Development Foundation in Taiwan appreciates the opportunity to respond to the above exposure draft (the “ED”).

We would like to comment on the issue regarding the measurement date for non-cash consideration. Paragraph BC99 of the ED mentions that the measurement date could be interpreted as one of several dates: (a) at contract inception; (b) when the non-cash consideration is received; or (c) at the earlier of when the non-cash consideration is received and when the related performance obligation is satisfied. If the fair value of non-cash consideration could be measured at different measurement dates, determined by accounting policy, this could sometimes result in revenues (i.e., transaction prices) recognized from the transactions at materially different amounts. To enhance comparability, we suggest that the IASB specify the measurement date to eliminate diversity in practice. We agree with IASB that the issue should be considered more comprehensively in a separate project.

The comments are those of the Financial Accounting Issues Task Force and do not necessarily represent official opinions of the TFRSC. If you have any question about our comments, please contact me (via my email: [ccliu@management.ntu.edu.tw](mailto:ccliu@management.ntu.edu.tw)) or Ms. Louise Wu (via her email: [louise@ardf.org.tw](mailto:louise@ardf.org.tw)).

Sincerely Yours,



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Chi-Chun Liu, Ph.D.

Chairman,

Taiwan Financial Reporting Standards Committee,

Accounting Research and Development Foundation, Taiwan