



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

March 24, 2012

Wendy M. Payne, Executive Director
Federal Accounting Standards Advisory Board
Mailstop 6K17V
441 G Street, NW, Suite 6814
Washington, DC 20548

Dear Ms. Payne:

Thank you for the opportunity to provide comments on the February 28, 2012 Exposure Draft (ED) titled "Accounting for Impairment of General Property, Plant, and Equipment Remaining in Use." Our comments, in response to the questions in the ED are attached.

Again, we appreciate the opportunity to comment on this Exposure Draft. If we can be of further assistance, please contact Marilyn Evans at (202) 622-0807.

Sincerely,

Carole Y. Banks

Director, Financial Reports and Policy

Word Version of Request for Comments***Accounting for Impairment of General Property, Plant, and Equipment
Remaining in Use - Exposure Draft*****Comments Requested by May 28, 2012**

Name of Respondent: Marilyn Evans**Organization Represented: Department of the Treasury**

Q1. The Board proposes to establish a requirement to recognize impairment losses when there is a significant and permanent decline, whether gradual or sudden, in the service utility of G-PP&E. Refer to paragraphs 8 and 10 of the proposed standards and paragraphs A3 through A5 in Appendix A - Basis for Conclusions for a discussion and related explanation.

Do you agree or disagree with the Board's proposal to recognize impairment losses when there is a significant and permanent decline, whether gradual or sudden, in the service utility of G-PP&E? Please provide the rationale for your answer.

Agree. To do so would show a more appropriate value of the G-PP&E and will make G-PP&E more relevant, reliable, and consistent for financial reporting purposes by providing guidance on material partial impairments.

Q2. The Board proposes that this Statement should not require entities to review their G-PP&E portfolios solely for potential impairments. Entities are not expected to alter existing assessment methods as a direct consequence of the proposed standards. Refer to paragraphs 7, 13, and 14 of the proposed standards and paragraphs A3b, and A4 through A9 in Appendix A - Basis for Conclusions for a discussion and related explanation.

Do you agree or disagree with the Board's proposal that this Statement should not require entities to review their G-PP&E portfolios solely for potential impairments? Please provide the rationale for your answer.

Agree. It will probably become very apparent if a G-PP&E becomes significantly or permanently impaired through the daily operations of the company. The current assessments (in place under SFFAS 6) along with current internal control standards, with further consideration, are adequate to determine impairments. A special G-PP&E portfolio review is unnecessary.

Q3. The Board has identified the following as indicators of G-PP&E impairments: evidence of physical damage, enactment or approval of laws or regulations which limit or restrict G-PP&E usage, changes in environmental or economic factors, technological changes or evidence of obsolescence, changes in the manner or duration of use of G-PP&E, and construction stoppage or contract termination, and G-PP&E scheduled or awaiting disposal (i.e., idled or unserviceable), retirement, or removal for excessively long periods. Refer to paragraph 12 of the proposed standards and paragraphs A4 through A9 and A11 through A16 in Appendix A - Basis for Conclusions for a discussion and related explanation.

Do you agree or disagree with each of the indicators of G-PP&E impairment? Please provide the rationale for your answer.

Agree. They provide preparers of financial statements with the best information to consider when reviewing G-PP&E for impairment.

Q4. The Board believes that impairment losses should be estimated using a measurement method that reasonably reflects the diminished or lost service utility of the G-PP&E. The Board has identified the following methods for use in the federal environment to measure diminished service utility: replacement approach; restoration approach; service units approach; deflated depreciated current cost approach; cash flow approach; and for construction stoppages/contract terminations the lower of (1) net book value or (2) the higher of its net realizable value or value-in-use estimate approach. Refer to paragraph 17 of the proposed standards and paragraphs A11 through A19 in Appendix A - Basis for Conclusions for a discussion and related explanation.

Do you agree or disagree that the measurement method selected should reasonably reflect the diminished service utility of the G-PP&E? Do you agree or disagree with the use of the measurement methods identified? Please provide the rationale for your answer.

Agree. The measurement method selected should reasonable reflect the diminished service utility of the G-PP&E in order to reasonably estimate the portion of the net book value associated with the diminished service utility of the G-PP&E. Agree. They are reasonable to determine impairment loss based on daily operations.

Q5. The Board believes that the benefits of implementing this Statement outweigh its administrative costs of implementation. Benefits include: specific impairment guidance for federal G-PP&E, eliminating the need to rely on other accounting literature to determine appropriate treatment, reporting impairments when they occur rather than through depreciation expense or disposal, providing management with information useful for decisions regarding G-PP&E investments, discerning the cost of impairments and impact on the entity and the cost of services provided following the

impairment, and lastly, enhancing comparability between entities. Refer to paragraph A21 in Appendix A - Basis for Conclusions for a discussion and related explanation.

a. Are there other costs or benefits in addition to those identified by the Board that should be considered in determining whether benefits outweigh costs? Please provide the rationale for your answer.

None identified

b. Are there G-PP&E categories, classes, or base units to which provisions of this proposed Statement should not apply? Please provide the rationale for your answer.

None identified

c. Do you agree or disagree that the benefits of implementing this Statement outweigh its costs? Please provide the rationale for your answer.

Agree. Benefits of implementing this Statement outweigh the costs. The costs are minimal administratively speaking. The benefits allow for a more clear guidance on the treatment of impaired G-PP&E.