

**From:** Dilustro, Ronald P. (HQ-LD030)  
**Sent:** Friday, May 25, 2012 3:45 PM  
**To:** Savini, Domenic N  
**Cc:** Robinson, Scott E. (HQ-LD030)  
**Subject:** RE: FASAB: Feb 28 Exposure Draft comments

Dom,  
See attached comments from the Facilities side of the House.  
Happy Memorial Day weekend,  
Ron

**NASA FACILITIES ENGINEERING DIVISION****5-25-12****RESPONSE TO QUESTIONS FOR RESPONDENTS REGARDING EXPOSURE  
DRAFT ON “ACCOUNTING FOR IMPAIRMENT OF GENERAL PROPERTY,  
PLANT, AND EQUIPMENT IN USE.**

**Q1: 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.**

We agree with the recognizing impairment losses for a significant/catastrophic event such as a building Destruction from a hurricane, tornado, or earthquake. In the Facilities GSA / Federal Real Property Council Reporting Requirements (FRPCRR), we account for all the assets in our inventory until they are demolished or disposed of. NASA and all the Federal Agencies are required by the FRPCRR to report the condition and Deferred Maintenance and Repair (DM&R) on an annual basis. We can provide additional information when asked about a particular asset.

**Q2: 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.**

We agree. As mentioned above, we do a complete assessment of our facilities every year to address the condition, DM&R, and track and trend our change in order to manage our portfolio within our budget guidelines.

**Q3: Do you agree or disagree with each of the indicators of G-PP&E impairment? Please provide the rationale for your answer.**

We disagree. The Federal Facilities and Real Property organizations report a number of data elements per the FRPCRR, which we consider as excellent indicators. Facilities support the various Program Requirements within the agency. These facilities, programs, and requirements all have various schedules. It would be very difficult to rate and grade by these indicators on a yearly start and stop basis. We can provide additional information when asked about a particular asset.

**Q4: 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.**

We disagree. The Federal Facilities organizations are required to report annually per the FRPCRR, which does not include a number of the budget factors, such as depreciation. A Federal facility, even if it is historical, requires the identical FRPCRR reporting. The CRV and DM&R remains on the books until demolition or disposition. We can provide additional information when asked about a particular asset.

**Q5:**

- 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.**
- b. Are there G-PP&E categories, classes, or base units<sup>3</sup> to which provisions of this proposed Statement should not apply? Please provide the rationale for your answer.**
- c. Do you agree or disagree that the benefits of implementing this Statement outweigh its costs? Please provide the rationale for your answer.**

A, B, C, We disagree. The Facilities Organizations provide a complete cost analysis of the different options for Maintenance, Repair, Rehabilitation, Repair by Replacement, and Construction in order to satisfy the Program Requirements, Safety, Health, Environmental, Code Compliance, etc. A project description/synopsis is submitted to OMB for approval of all Major Construction Projects. We can provide additional information when asked about a particular asset.