



OFFICE OF THE UNDER SECRETARY OF DEFENSE  
1100 DEFENSE PENTAGON  
WASHINGTON, DC 20301-1100

COMPTROLLER

Ms. Wendy M. Payne  
Executive Director  
Federal Accounting Standards Advisory Board  
Mailstop 6H19  
441 G Street, NW, Suite 6814  
Washington, DC 20548

JAN 29 2013

Dear Ms. Payne:

The Department of Defense appreciates the opportunity to comment on the Federal Accounting Standards Advisory Board Exposure Draft Amending Statement of Federal Financial Accounting Standard 36, Deferral of the Transition to Basic Information for Long-Term Projections. We have reviewed the draft and agree with the rationale for delaying the exposure draft until the American Institute of Certified Public Accountants can finalize the impact on how long-term projections will be covered by existing audit standards.

Our response is enclosed. My contact is Ms. Carol A. Campbell. She can be reached at [carol.campbell@osd.mil](mailto:carol.campbell@osd.mil) or 703-601-0129.

Sincerely,

A handwritten signature in cursive script, reading "Donjette L. Gilmore", is written over a horizontal line.

Donjette L. Gilmore  
Director, Accounting and Finance Policy

Enclosure:  
As stated



## Deferral of the Transition to Basic Information for Long-Term Projections

Please submit to [fasab@fasab.gov](mailto:fasab@fasab.gov)

**Name of Respondent:** Donjette L. Gilmore, Director, Accounting and Finance Policy,  
DoD

**Organization:** Department of Defense

All responses are requested by January 31, 2013.

Q1. Do you agree or disagree with the proposed one-year deferral of the effective date for the transition of the statement presenting long-term fiscal projections for the U.S. government and related disclosures from required supplementary information (RSI) to basic information required in SFFAS 36, *Comprehensive Long-Term Projections for the U.S. Government*? The new effective date would provide for full implementation of SFFAS 36 for reporting periods beginning after September 30, 2013. Please explain the reasons for your position in as much detail as possible (see discussion in pars. A1 through A4).

Agree. Deferring the effective date is judicious since the audit community is still revising their audit guidance for projections and assumptions. Additionally, preparers will need time to adapt their reporting procedures for the new audit guidance. Therefore, a deferral of the transition is warranted.