

U.S. Department of LaborOffice of Inspector General
Washington, D.C. 20210**JAN 06 2017**

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

Dear Ms. Payne:

On behalf of the Office of Audit, Office of Inspector General, Department of Labor, enclosed are our responses to questions posed in the exposure draft titled, "Conforming Amendments to Technical Releases for SFFAS 50, Establishing Opening Balances for General Property, Plant, and Equipment."

If you have any questions or need additional information, please contact Joseph L. Donovan, Jr., Audit Director, Financial Statement Audits, at 202-693-5248.

Sincerely,

A handwritten signature in cursive script that reads "Elliot P. Lewis".

Elliot P. Lewis
Assistant Inspector General for Audit

Enclosure

Conforming Amendments to Technical Releases for SFFAS 50, Establishing Opening Balances for General Property, Plant, and Equipment

Please select the type(s) of organization responding to this exposure draft. If you are not responding on behalf of an organization, please select "individual."

- Accounting Firm _____
- Federal Entity (user) _____
- Federal Entity (preparer) _____
- Federal Entity (auditor) X
- Federal Entity (other) _____ If other, please specify: _____
- Association/Industry Organization _____
- Nonprofit organization/Foundation _____
- Other _____ If other, please specify: _____
- Individual _____

Please provide your name.

Name: Elliot P. Lewis, Assistant Inspector General for Audit

Please identify your organization, if applicable.

Organization: U.S. Department of Labor, Office of Inspector General

Q1. In light of the recently issued Statement of Federal Financial Accounting Standards (SFFAS) 50, *Establishing Opening Balances for General Property, Plant, and Equipment: Amending Statement of Federal Financial Accounting Standards (SFFAS) 6, SFFAS 10, SFFAS 23, and Rescinding SFFAS 35*, this TR clarifies existing TRs by providing conforming amendments (**see par. 3-11 and par. A5-A8**). These amendments acknowledge the rescission of SFFAS 35 and that all standards-level implementation guidance for general property, plant, and equipment (with the exception of certain provisions applicable to internal use software) now resides in SFFAS 6.

Do you agree or disagree that this TR clarifies the technical guidance? Please provide the rationale for your answer.

We agree that the Technical Release clarifies the issues surrounding the Opening Balances of General Property, Plant, and Equipment. The clarifications assist in providing sound accounting principles for recording opening balances of General Property, Plant, and Equipment.

Q2. Are there additional amendments or issues that the AAPC should consider in this TR? If so, what are they, and how would you describe them? Please provide the rationale for your answer.

We believe there are not additional adjustments or clarifications necessary at this time.