

*Omnibus Technical Release Amendments 2022: Conforming Amendments*

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**Please provide your name.**

Name: Kenneth Kirtley

**Please identify your organization, if applicable.**

Organization: General Services Administration

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- Q1.** This proposed Technical Release (TR) would provide conforming amendments to previously issued TRs to ensure the TRs are consistent with the pronouncements identified in paragraph 2 of the proposed TR. Specifically, this TR would provide conforming amendments to the following:
- TR 10, *Implementation Guidance on Asbestos Cleanup Costs Associated with Facilities and Installed Equipment*
  - TR 11, *Implementation Guidance on Cleanup Costs Associated with Equipment*
  - TR 14, *Implementation Guidance on the Accounting for the Disposal of General Property, Plant & Equipment*
  - TR 20, *Implementation Guidance for Leases*

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

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GSA concurs with the proposed amendments to TR10, 11, 14 and 20.

However, we have (A) one general comment that applies to the suggested changes for TR10 and 14 and (B) one clarification question for TR20 below.

(A) Paragraphs 6 (with footnote 11), 8 (box 13), and 19 (both bullets) for amendments to TR10 and paragraphs 27 and 28 for TR14 have removed reference to other specified FASAB standards or technical releases and broaden to a reference that all of GAAP should be followed. Removing this specificity and replacing it with such a broad umbrella of complying with GAAP is less useful to agencies when trying to correctly implement these standards. We request keeping the specific references, especially in TR and implementation guidance, as the specificity helps facilitate application of all applicable standards or releases.

(B) Paragraph 27 of SFFAS 54 includes recognizing lease-related operating costs paid to the lessor as expenses. This paragraph is cited in TR 20 as part of the annual lease expense to be disclosed for intragovernmental leases.

The requirements for disclosing operating costs appear to be inconsistent depending on the lease type as right-to-use leases (RTU) do not require a disclosure that mirrors paragraph 27 of SFFAS 54.

In accordance with paragraphs 72-77 of SFFAS 54, operating costs are deemed to be a non-lease component of the contract that should be separated from the lease asset component.

We would like to confirm if non-lease components, that are inherently lease-related, should be included in the annual lease expense disclosures for intragovernmental leases (paragraph 27) and excluded from the RTU lease disclosures (paragraph 54). If so, we would ask that clarity be added to paragraph 17 of TR 20 to acknowledge the inconsistency of the requirements.

**Q2.** Are there additional conforming amendments to previously issued TRs that the AAPC should consider in this TR? If so, what are they? Please provide the rationale for your answer.

GSA did not identify the need for any additional conforming amendments to previously issued TRs.