

May 31, 2022

Ms. Monica R. Valentine
Executive Director
Federal Accounting Standards Advisory Board
441 G Street, NW, Suite 1155
Washington, DC 20548

Dear Ms. Valentine:

The Greater Washington Society of Certified Public Accountants (GWSCPA) Federal Issues and Standards Committee (FISC) appreciates the opportunity to provide comments on the Federal Accounting Standards Advisory Board (FASAB or “the Board”) Accounting and Auditing Policy Committee’s (AAPC) Exposure Draft (ED) on the proposed Federal Financial Accounting Technical Release (TR), *Omnibus Technical Release Amendments 2022: Conforming Amendments*.

The GWSCPA consists of approximately 3,300 members, and the FISC includes nearly 20 GWSCPA members who are active in financial management, accounting, and auditing in the Federal sector. We sincerely appreciate the opportunity by the Board to share our views.

Our responses to the ED questions are listed below.

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.

A1. The FISC agrees with the proposed amendments and that this TR clarifies the technical guidance for the reasons stated in the ED. The FISC recommends that the AAPC consider replacing the term “temporarily removed from service” in paragraph 26 with “other than permanently removed from service” for the reasons outlined in paragraph A13 of TR 14.

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.

A2. The FISC does not have additional conforming amendments to previously issued TRs to share with the AAPC.

Ms. Valentine, Federal Accounting Standards Advisory Board

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This comment letter was reviewed by the members of FISC, and represents the consensus views of our members.