

Instructions: Please record your comments in the table below.

Section. Provide the section number for each comment.

Page: Identify the page number

Sentence(s). Specify the sentence(s) for which the comment is provided.

Reason: Specify whether the comment is provided because the draft language is: (1) unnecessary, (2) unclear, or (3) inaccurate.

Proposed Change: For draft language that is unclear or inaccurate, please provide revised language.

Commenter. Please provide a contact name for each comment.

Commenter Contact Info: List your email or phone number

Section	Page	Sentence	Reason	Proposed Change	Commenter	Contact Info
Question #1	3	In general, we agree with the proposed guidance as it provides greater clarity that was previously lacking, especially regarding types of transactions that should be deemed exchange revenues. The specific examples provided in paragraphs 13 through 20 are particularly helpful. However, greater clarity is needed regarding the timing of recognition and amount to be recognized.			Erik Dorman	erik.dorman@gsa.gov (202) 501-4568
Appendix A, paragraph A4.	9	"This TB does not address recognition and measurement of exchange transactions. Existing standards adequately address the timing of recognition as well as the amount to be recognized."	We disagree with conclusion stated in Appendix A, paragraph A4 that existing standards are adequate in this regard, as there are currently significant intragovernmental disputed differences, as agencies do not agree on accounting standard requirements for some of the intragovernmental transactions that this technical bulletin would address.	We propose the Technical Bulletin address timing of recognition and amounts for such transactions.	Erik Dorman	erik.dorman@gsa.gov (202) 501-4568
Appendix A, paragraph A4.	9	"This TB does not address recognition and measurement of exchange transactions. Existing standards adequately address the timing of recognition as well as the amount to be recognized."	Specific examples of agreements for which clarity is requested applies when reimbursable agreements are not stand-alone documents, and the impact of one reimbursable agreement directly, or causally, impacts a separate reimbursable agreement. For example, GSA has had agreements where another agency provides funding for GSA to acquire or make alterations to real property that the customer agency will ultimately lease from GSA. Agreements for such capital acquisition funding are independent from and normally negotiated at different times than the occupancy agreements GSA makes with the agency for subsequent building rental. In most instances the initial capital acquisition may be completed and reimbursements made prior to determinations of impacts on subsequent rental arrangements. In most of such cases, GSA has provided significant rent reductions due to the capital contribution provided by the customer agency. When such conditions exist, it is not clear from existing standards whether or when such inter-related agreements should be considered as one. Such matters are complicated when there may be significant differences in the time period (such as more than a year) that one agreement is completed (i.e. a capital acquisition) and the other is negotiated (rental reductions).	GSA requests additional guidance be provided to discuss issues such as deferral of revenue recognition over time and recognitions of amounts when there are inter-related (directly or causally) agreements.	Erik Dorman	erik.dorman@gsa.gov (202) 501-4568