

*Deferral of the Effective Date of SFFAS 54, Leases*

**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."**

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**Please provide your name.**

Name: William S. Fleming

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

Organization: U.S. Securities and Exchange Commission

*Please email your responses to [fasab@fasab.gov](mailto:fasab@fasab.gov). If you are unable to respond by email, please fax your comments to (202) 512-7366.*

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**Q1.** Do you agree with the proposed two-year deferral of the effective date of SFFAS 54, *Leases: An Amendment of SFFAS 5, Accounting for Liabilities of the Federal Government, and SFFAS 6, Accounting for Property, Plant, and Equipment?* The new effective date would provide for full implementation of SFFAS 54 for reporting periods beginning after September 30, 2022. Please provide supporting details behind reasons for your position.

Agree. The two-year deferral would provide the Board, the AAPC, and FASAB staff the time necessary to develop and issue implementation guidance to assist federal reporting entities, by addressing the extensive complexity and breadth of implementation issues identified by the leases implementation guidance task force. The deferral would also provide preparers with additional time to complete implementation activities and consider implementation guidance issued in advance of the deferred effective date.