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This proposed Statement would address certain ongoing areas of concern related to leases implementation that were not addressed in SFFAS 60, *Omnibus Amendments 2021*, including:

- clarifying the Board’s original intent for discounting lease liabilities and receivables, which should result in a more consistent and comparable application of SFFAS 54, *Leases*, requirements; and
- clarifying the applicability of paragraphs 89-92 of SFFAS 54 to intragovernmental sale-leasebacks and the disclosure requirements applicable to them

**QFR 1** Do you agree or disagree with the proposed amendments to address discounting lease liabilities and receivables, as reflected in paragraphs 3-7 (amending par. 42, 47-48, and 59 of SFFAS 54), and the Board’s basis for such proposals? Please provide the rationale for your answer.

**Agree: Providing guidance to use “...marketable Treasury securities with similar maturity to the end of the lease term”, when the rate is not stated in the lease, provides consistency calculating and recording leases through the government. The use of Treasury securities interest rates with similar maturities will also provide comparability of lease agreements for the public and other users of Government financial statements.**

**QFR 2** Do you agree or disagree with the proposed amendments to clarify the applicability of paragraphs 89-92 of SFFAS 54 to intragovernmental sale-leasebacks and the disclosure requirements applicable to them, as reflected in paragraphs 8-9, and the Board's basis for such proposals? Please provide the rationale for your answer.

**Agree: Additional clarification by referencing specific citations and guidance regarding disclosure of terms and conditions leads to more consistent reporting and comparability for the public.**