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**Please provide your name.**

Name: Yulonte Merrell

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

Organization: Defense Logistics Agency – J85

*Please email your responses to [p3s@fasab.gov](mailto:p3s@fasab.gov). If you are unable to respond by email, please call (202) 512-7350 to make alternate arrangements.*

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This proposed Federal Financial Accounting Technical Release (TR) would assist reporting entities in implementing Statement of Federal Financial Accounting Standards (SFFAS) 49, *Public-Private Partnerships: Disclosure Requirements*.

**QFR 1** Do you generally support the proposed additional guidance, including the proposed general principles contained in this TR? Please also explain any alternatives or additional implementation challenges that you suggest the Committee address and the reasons for your position. Refer to paragraphs 1-9 that discuss this TR’s proposed purpose and scope and paragraphs A10-A12 in the basis for conclusions.

The proposed guidance is beneficial as the integration of disclosures to avoid repetition and enhance clarity eliminates confusion. SFFAS 49 requirements for concise, meaningful, and transparent information are further strengthened by this coordination guidance. The guidance acknowledges the complexity of P3 arrangements and the need for professional judgment in determining the best approach to disclosure. The inclusion of examples of related standards (SFFAS 47, 54, 2, and 5) is helpful in illustrating the potential for overlap and interaction. The guidance could also benefit from more specific examples, perhaps even case studies. These examples can illustrate different types of P3 arrangements and how the disclosure requirements of SFFAS 49 interact with other standards. The current guidance relies heavily on professional judgment, which can lead

to inconsistencies in application. More detailed examples provide a framework for preparers.

**QFR 2** Do you generally support the proposed guidance related to applying the risk-based characteristics in SFFAS 49? Please also explain any alternative solutions to the proposed answers or additional questions that you suggest the Committee address and the reasons for your position. Refer to paragraphs 10-13, the proposed questions and answers, and paragraph A10 in the basis for conclusions.

Yes, the proposed guidance provides a framework for entities to consider when evaluating the risk-based characteristics of P3 arrangements.

**QFR 3** Do you generally support the proposed guidance that clarifies the interrelationship between SFFAS 49 and SFFAS 47, *Reporting Entity*? Please also explain any alternative solutions to the proposed answers or additional questions that you suggest the Committee address and the reasons for your position. Refer to paragraphs 14-20, the proposed questions and answers, paragraphs A10-A14 in the basis for conclusions, and appendix B.

Yes, the proposed guidance provides more clarification in financial reporting. For example, confirmation that SFFAS 49 does not apply to consolidated P3 entities, emphasis on professional judgment in coordinating disclosures, and guidance on how to coordinate disclosures for disclosure entities and related parties.

**QFR 4** Do you generally support the proposed guidance that clarifies the interrelationship between SFFAS 49 and SFFAS 54, *Leases*? Please also explain any alternative solutions to the proposed answers or additional questions that you suggest the Committee address and the reasons for your position. Refer to paragraphs 21-31, the proposed questions and answers, paragraphs A10-A14 in the basis for conclusions, and appendix B.

Yes, the proposed guidance addresses a common scenario (P3s involving leases) and provides a clear framework for coordinating disclosures.

**QFR 5** Do you generally support the proposed guidance that coordinates the disclosures when other standards covering long-standing arrangements/transactions also apply? Refer to paragraphs 32-36, the proposed questions and answers, paragraphs A11-A12 in the basis for conclusions, and appendix B.

Yes, this guidance reinforces the core principle of integrated disclosures and provides helpful clarification on how SFFAS 49 interacts with other standards. The emphasis on avoiding duplication and using cross-references is particularly valuable.

**QFR 6** Do you generally support including (1) the proposed process flowchart that illustrates the applicability of SFFAS 49 to SFFAS 47 and SFFAS 54 and (2) the summary of disclosure requirements? If not, please explain any alternative solutions to the proposed material that you suggest the Committee address and the reasons for your position. Refer to appendix B.

Yes, DLA supports the proposed process flowchart that illustrates the applicability of SFFAS 49 to SFFAS 47 and SFFAS 54 and (2) the summary of disclosure requirements.

**QFR 7** Do you have any comments or suggestions on other aspects of the proposed TR that are not addressed in the above questions? Please note that these proposals may be further modified before a final TR is issued. As such, it is important that you comment on aspects that you favor as well as any that you do not favor.

No additional comments or suggestions on other aspects of the proposed TR not addressed in the above questions.