

December 4, 2009

Ms. Wendy M. Payne, Executive Director
Federal Accounting Standards Advisory Board
441 G Street, NW, Suite 6814
Washington, DC 20548

Advancing
Government
Accountability

2208 Mount Vernon Ave
Alexandria, VA 22301

(703) 684-6931
(703) 548-9367 (fax)

Dear Ms. Payne:

On behalf of the Association of Government Accountants (AGA), the Financial Management Standards Board (FMSB or the board) appreciates the opportunity to provide comments to the Federal Accounting Standards Advisory Board (FASAB) on its proposed Technical Release, *Implementation Guidance on Asbestos Cleanup Costs Associated with Facilities and Installed Equipment*. The FMSB, comprising 23 members with accounting and auditing backgrounds in federal, state and local government, academia and public accounting, reviews and responds to proposed standards and regulations of interest to AGA members. Local AGA chapters and individual members are also encouraged to comment separately. The majority of FMSB members approved issuance of this comment letter. The FMSB has responses to the questions posed and an editorial comment..

Q1. *Do you agree or disagree with the methodology outlined for identifying real property containing asbestos (paragraph 16)? Please provide the rationale for your answer.* We agree with the methodology in paragraph 16, but think that the Board may want to consider listing the types of materials likely to contain asbestos and to note that buildings constructed prior to 1979 are likely to contain asbestos. We think that would be helpful. Also, should agencies be referred to the National Institute for Standards and Technology (NIST) for recommendations or to receive a listing of accredited asbestos laboratories?

Q2. *Do you agree or disagree with the assessment to be applied to these facilities expected to contain asbestos (paragraph 17)? Please provide the rationale for your answer. Do you believe additional or different assessments should be applied? If so, please specify?* We agree with the assessment to be applied to those facilities expected to contain asbestos in paragraph 17 as it appears to cover all reasonable assessments. We cannot think of any additional assessments that might be required.

Q3. *Do you agree or disagree with the list of estimating methodologies proposed to estimate the cost of removal, containment or disposal of real property or group of real properties (paragraph 18)? Please provide the rationale for your answer. Do you believe additional methodologies should be included? If so, please specify.* Yes, we agree with the list of estimating methodologies and cannot think of any additional methodologies.

Q4. *Do you agree or disagree with the example of practice for evaluating asbestos cleanup costs associated with real property repair and renovation (Appendix B)? Please provide the rationale for your answer.* We agree with the examples in Appendix B and think that the two examples provided are well laid out.

Q5. *Do you agree or disagree with the example of practice for evaluating asbestos cleanup costs associated with real property demolition (Appendix B)? Please provide the rationale for your answer.* We agree with the example of practice for evaluating asbestos cleanup costs associated with real property demolition in Appendix B and the provided possible criteria.

Q6. *Do you believe additional technical guidance related to asbestos cleanup costs associated with facilities and installed equipment is needed in this proposal? Please provide the rationale for your answer.* We cannot think of any additional technical guidance related to asbestos cleanup costs associated with facilities and installed equipment that would be required.

Editorial comment: We recommend a search and replace of 'e.g.' to 'e.g.,'

We appreciate the opportunity to comment on this document and would be pleased to discuss this letter with you at your convenience. If you have questions concerning the letter, please contact Anna D. Gowans Miller, CPA, AGA's director of research and staff liaison for the FMSB, at amiller@agacgfm.org or 703.684.6931 ext. 313.

Sincerely,



Robert L. Childree, Chair
AGA Financial Management Standards Board

cc: William A. Morehead, Ph.D., CPA, CGFM
AGA National President

**Association of Government Accountants
Financial Management Standards Board**

July 2009 – June 2010

Robert L. Childree, Chair
Katherine J. Anderson
Frank D. Banda
Eric S. Berman
Irwin T. David
Michael H. Granof
Jeffrey W. Green
J. Dwight Hadley
David R. Hancox
Rashad A. Holloway
David C. Horn
Albert A. Hrabak
Drummond Kahn
Simcha Kuritzky
Valerie A. Lindsey
Jeffrey A. Long
Edward J. Mazur
Craig M. Murray
Suesan R. Patton
Leslie I. Tanaka
Clarence L. Taylor, Jr.
Roger Von Elm
Stephen B. Watson

Relmond P. Van Daniker, Executive Director, AGA (Ex-Officio Member)
Anna D. Gowans Miller, Technical Manager, AGA, Staff Liaison