

b. Your ability to assess a government's accountability? Inclusion of pension costs in the period when services are provided and taxpayers are charged for those services will hold the elected officials responsible for the decisions that they make.

c. Your ability to assess interperiod equity? By charging the current period for the costs of services provided permits the taxpayer to realize the total costs of those services.

7. Do you agree or disagree with the GASB's proposals that governments in cost-sharing multiple-employer plans report a liability equal to their long-term proportionate share of the collective net pension liability? Why do you agree or disagree? I agree since it permits the identification of the pension costs for all pension plans (single or multiple-employer).

**8. How would recognition of a proportionate net pension liability affect any or all of the following:
a. The usefulness of the information to the analyses you perform, the work you do, or the decisions you make? Inclusion of these pension costs in the financials of all employers using cost-sharing multiple-employer plans would better identify the total costs of these services.**

b. Your ability to assess a government's accountability? Inclusion of these costs will help identify the total costs for services provided (i.e. cost per student at schools using cost-sharing multiple-employer plans).

c. Your ability to assess interperiod equity? Interperiod equity will be much more accurate since the total costs of services provided will be more clearly identified.

9. Do you agree or disagree with the GASB's proposals regarding note disclosures and RSI? Why do you agree or disagree?

10. How would these disclosures and RSI affect any or all of the following:

a. The usefulness of the information to the analyses you perform, the work you do, or the decisions you make? I agree since the information more fully explain the circumstances surrounding each pension plan.

b. Your ability to assess a government's accountability? With more information, the elected officials can be held more accountable.

c. Your ability to assess interperiod equity? With the additional information specified, the period impacted can be more clearly defined.

11. Do you agree or disagree with the GASB's proposals regarding special funding situations? Why do you agree or disagree? I agree since it assures consistency in the handling of these special funding situations.

12. How would these proposals affect any or all of the following:

a. The usefulness of the information to the analyses you perform, the work you do, or the decisions you make? More consistency in the recording of these situations provides a better basis on establishing benchmarks.

b. Your ability to assess a government's accountability? Anytime the data can be made more comparable provides a better basis on which to hold elected officials accountable for the decisions that they make.

c. Your ability to assess interperiod equity? Consistency in the recording of these situations will permit the appropriate periods to be charged for the services provided.

13. Do you agree or disagree with the GASB's proposals regarding governments participating in defined contribution pension plans? Why do you agree or disagree? I agree since I have no problem with the way that defined contribution plans are presented.

14. How would these proposals affect any or all of the following:

a. The usefulness of the information to the analyses you perform, the work you do, or the decisions you make? No material changes indicates that the standard has stood the test of time and there is no need for me to change my analyses.

b. Your ability to assess a government's accountability? Use of defined contribution plans provide fewer financial risks for governments and lessen the need for closer accountability from elected officials.

c. Your ability to assess interperiod equity? Each employee's contribution is charged to the appropriate period and interperiod equity is not materially impacted.

Respectfully submitted,

Dr. Jesse Hughes, CPA, CIA, CGFM
Professor Emeritus of Accounting
Old Dominion University
Norfolk, VA 23529