



Portage Metropolitan Housing Authority

October 12, 2011

Director of Research and Technical Activities
Project No. E-34
Governmental Accounting Standards Board
401 Merritt 7, PO Box 5116
Norwalk, CT 06856-5116

To the Director of Research and Technical Activities:

The Portage Metropolitan Housing Authority is a participating employer in the Ohio Public Employees Retirement System (OPERS), a cost-sharing multi-employer plan with approximately 3,700 employers. We are responding to the Governmental Accounting Standards Board (GASB) invitation to provide comments on its Exposure Draft, Accounting and Financial Reporting for Pensions and amendment of GASB Statement No. 27. This Exposure Draft addresses changes in the way participants in government sponsored pension plans account for and report pension assets and liabilities in their annual financial statements.

State statute determines the contribution rates and the retirees' benefits. OPERS has the authority to request changes to both of these. Employers do not have any control over these.

We recommend that the net pension liability be reflected on the financial statements of the pension system where the assets for future pension benefits are also reported. OPERS should be culpable for their investment decisions.

Will OPERS pay for a timely audit of their calculations of the proportionate share of the net pension liability, pension expense, and any additional note disclosures? The liability could be large and volatile affecting entities' budgets, the public's trust, and the cost of borrowing. Thank you in advance for your attention to this important matter.

Sincerely,

Fred Zawilinski
Executive Director