Letter of Comment No. 1 File Reference: 3-17E Date Received: 5/3/12

THOMAS P. DINAPOLI STATE COMPTROLLER



110 STATE STREET ALBANY, NEW YORK 12236

STATE OF NEW YORK OFFICE OF THE STATE COMPTROLLER

April 25, 2012

Mr. David Bean
Director of Research and Technical Activities
Governmental Accounting Standards Board
Project No. 3-17
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

Dear Mr. Bean:

On behalf of the Office of the State Comptroller, I am pleased to respond to the Governmental Accounting Standards Board Exposure Draft (ED), Proposed Statement of the Governmental Accounting Standards Board on "Government Combinations and Disposals of Government Operations". I generally agree with the ED as presented and have no comments to share with the Board.

Thank you for providing the opportunity to comment on this ED. If you have any questions or require further details concerning my comments, please feel free to contact me at (518) 486-1234.

Sincerely,

Suzette Baker, CPA, CGFM

Executive Director

Bureau of Financial Reporting and

Oil Spill Remediation