

**COUNTY OF STILLWATER**  
**STATE OF MONTANA**  
**STILLWATER COUNTY COMMISSIONERS**  
**P. O. BOX 970**  
**COLUMBUS, MONTANA 59019**

October 14, 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

RE: Proposed Changes to GASB Statement Nos. 25 and 27

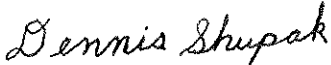
Dear Director:

Stillwater County would like to express its desire to not implement the proposed changes to the Pension and Financial Reporting standards as presented. We feel that the requirements imposed would place an undue financial burden upon small local governments like Stillwater County, in both time and tax dollars.

The additional information on the pensions would not provide useful information to the users of our financial statements as most information is to be based on estimates and expectations and would not be able to measure future changes in the economy or environment.

Thank you for the opportunity to comment on this proposed action.

**BOARD OF COUNTY COMMISSIONERS**  
**STILLWATER COUNTY**

  
Dennis Shupak, Chairman

*Absent for Signature*  
Gerald W. Dell, Member

  
Maureen Davey, Member

Cc: Senator Max Baucus  
Representative Denny Rehberg  
Senator Jon Tester  
Montana Association of Counties  
National Association of Counties