Letter of Comment No. 442 File Reference: 34-E Date Received: 10/14/11

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October 4, 2011

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

Dear Director of Research and Technical Activities :

As an educator with Fairfield Susun USD, I am writing in opposition to the proposed transfer of the California State Teachers' Retirement System (CalSTRS) unfunded pension obligation from the State of California's financial statements to that of the Local Education Agencies (LEAs).

The draft proposal includes provisions that school districts recognize on their balance sheets each employer's proportional share of the CalSTRS total pension liability. It's estimated that the debt transfer would be approximately \$8,000 per student placed on the districts' balance sheets but not subject to district control.

California school districts are already subject to \$9.3 billion in annual state funding deferrals from one year to the next. In addition to the inter-year deferrals, the schools have up to \$4.5 billion in intra-year state aid deferrals. Schools need borrowing ability to maintain programs until the deferrals are paid.

The proposal will increase borrowing costs by pushing our debt ratios upward until we must pay more to borrow, since the probable effect of that debt increase will be to increase the cost of borrowing.

For these reasons, I respectfully request that California school districts not be required to include recognition of any California State Teachers' Retirement System unfunded actuarial liability on their balance sheets. We have shouldered more than our fair share of the burden of our State's financial crisis.

Sincerely,

Jacki Cottingim-Dias, PhD 9166165760