August 6, 2013

Governmental Accounting Standards Board
Attn: Director of Research and Technical Activities
Project No. 25-20
401 Merritt 7, P.O. Box 5116
Norwalk, CT 06856-5116

Dear Sir/Madam,

Thank you for the opportunity to comment on the Exposure Draft (ED), Pension Transition for Contributions Made Subsequent to the Measurement Date document. The Wisconsin State Controller’s Office is responsible for preparing the State of Wisconsin’s Comprehensive Annual Financial Report (CAFR). We agree with the ED and believe the proposed amendment to GASB Statement No. 68 would prevent potential significant understatements of beginning net position and expense.

The only change to the proposal we have would be to add the following language, “….related to those subsequent contributions.” to the end of the third sentence in paragraph 13 in order to avoid any confusion of whether or not all deferred outflows are being referred to or only the specific deferred outflow related to making contributions after the measurement date.

We appreciate this opportunity to provide our comments to the GASB. Please contact Cindy Simon at (608) 266-3052 or Kip Zellmer at (608) 267-6958 if you need additional information.

Sincerely,

[Signature]
Stephen Censky, CPA
State Controller