May 25, 2016

Director of Research and Technical Activities
Project No. 3-24E

director@gasb.org

RE: Proposed Statement of the Governmental Accounting Standards Board, Leases

To Whom It May Concern:

One of the expressed goals of the Texas Society of Certified Public Accountants (TSCPA) is to speak on behalf of its members when such action is in the best interest of its members and serves the cause of Certified Public Accountants in Texas, as well as the public interest. The TSCPA has established a Professional Standards Committee (PSC) to represent those interests on accounting and auditing matters. The views expressed herein are written on behalf of the PSC, which has been authorized by the TSCPA Board of Directors to submit comments on matters of interest to the committee membership. The views expressed in this letter have not been approved by the TSCPA Board of Directors or Executive Board and, therefore, should not be construed as representing the views or policy of the TSCPA.

The following is our response to the above-referenced exposure draft (ED) Leases.

We agree with the guidance proposed in the GASB Exposure Draft on Leases. However, we feel the ED could have been improved if the Board would have included some examples of various types of leases and the applicable accounting. An example of lease accounting for copiers or computers, which often find a large number of units included in one agreement, would be appropriate. Also, leases of construction equipment that often have buyout options at the end of the lease period would be most helpful. Our committee also discussed the need for a better understanding of situations when re-measurement is appropriate along with the actual accounting that applies in such situations.

We appreciate the opportunity to participate in the standard setting process.

Sincerely,

Jerilyn K. Barthel, CPA
Chair, Professional Standards Committee
Texas Society of Certified Public Accountants