April 30, 2020

Director of Research and Technical Activities  
Governmental Accounting Standards Board  
Project No. 3-39

Dear Director of Research and Technical Activities:

The Minneapolis-Saint Paul Metropolitan Airports Commission (MAC) appreciates having the opportunity to comment on this exposure draft related the postponement of effective dates of certain authoritative guidance.

We strongly support this exposure draft to delay the effective dates to allow for sufficient time and resources to apply the new accounting and financial reporting requirements of the related statements and implementation guides in light of the COVID-19 pandemic. This delay of effective dates will provided much needed time to effectively apply the requirements of those standards and implementation guides noted in the exposure draft.

We would like to ask for consideration of a delay of two years to implement the requirements of GASB 87 for Leases, especially lessor requirements. As you may be aware, airports across North America and around the World have been greatly effected by the COVID-19 pandemic, which has significantly decreased the access to the resources needed to fully implement these statements and implementation guides by their current effective dates. This issue is also complicated by the unknown duration of the impact of the pandemic and when adequate resources will once again be available. MAC anticipates that as a result of the widespread impact to airlines and concessionaires that there will be a significant number of lease amendments and terminations over the next two years, which would be well beyond the volume of lease modifications that would be expected during normal operations. These factors will make the assessment of leases for this standard even more difficult to evaluate even by the one year extension date for implementation.

Thank you for the opportunity to respond. If you have any questions or need additional information regarding this response, please contact Nick Hinchley at (612) 726-8149.

Sincerely,

Nick Hinchley  
Interim Director of Finance  
Minneapolis-Saint Paul Metropolitan Airports Commission

Sent via email to director@gasb.org