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January 30, 2015

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Mr. David Bean
Director of Research and Technical Activities
Governmental Accounting Standards Board
Project No. 19-20E
401 Merritt 7, PO Box 5116
Norwalk, CT 06856-5116

Re: Proposed Statement of the Governmental Accounting Standards Board: *Tax Abatement Disclosures*

Dear Mr. Bean,

The Association of Local Government Auditors (ALGA) appreciates the opportunity to respond to GASB's exposure draft, *Tax Abatement Disclosures*. Our organization represents more than 300 audit organizations and about 2,000 members. This topic is of interest to our members, and we encourage individual audit organizations and members to comment independently should they choose to do so.

We have reviewed the exposure draft in its entirety. Overall, we agree with the basis and concepts in the Exposure Draft and find the wording to be satisfactory. Our one concern with the exposure draft is the potential difficulty for a reporting government to obtain the information needed to calculate the amount by which the reporting entity's tax revenues were reduced when the tax abatement agreement was entered into by another governmental entity. We recommend that the GASB consider modifying the language to provide a means by which the reporting entity can either defer the calculation requirement to the negotiating entity or otherwise disclose why it is unable to calculate the amount of the abatement.

Respectfully submitted,

Harriet Richardson
Chair, Professional Issued Committee

Key ALGA Contributors:

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