

STATE OF FLORIDA
LEE COUNTY PROPERTY APPRAISER
KENNETH M. WILKINSON, C.F.A.

Mailing Address:
P.O. Box 1546
Fort Myers, Florida 33902-1546

Physical Address:
2480 Thompson Street
Fort Myers, Florida 33901-3074



Letter of Comment No. 4-F
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Telephone: (239) 533-6100 -- (866) 673-2868 (From anywhere in continental US/Canada/Florida except 239 area code)
Facsimile: (239) 533-6160 -- **Website:** www.lcepa.org

David Bean, Director of Research and Technical Activities
Government Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, Connecticut 06856-5116

Re: Financial Reporting Model Improvements

Dear Mr. Bean:

We have studied your Preliminary Views, Financial Reporting Model Improvements recently released. As a local Government we find the suggested changes to be far more confusing and complicated than helpful. Please allow me to explain. The most important user groups are the respective government's management and governing officials and the public. Recently released GAO Yellow Book continues to emphasize the need for the Auditee to understand, be able to prepare and accept responsibility for the financial statements. At the same time, GAO is heightening the requirements for the auditor to remain independent. Most US Governments are still rebounding from the recession with limited resources for administration. The financial statements serve as a vital tool for us as management, the Board and the public. It is important to you and other regulators that the audit process and resulting financial statements are expensive and time-consuming and should be a useful tool that is understandable to the users and a reflection of actual revenue and expenditures. It is not to be an academic exercise designed at the behest of financial analysts. It is first and foremost imperative the financial statements continue to be prepared on a basis consistent with the respective budget and to serve as a practical and understandable management tool.

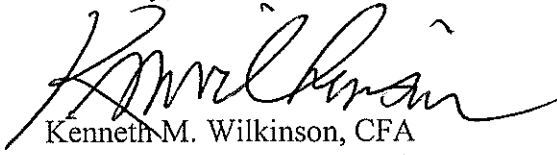
The volume of changes recently from the various standard setting groups have overwhelmed most governments and have left the above noted user groups struggling to understand. It is essential that there be a pause in new standards while GASB #75 is implemented.

Consistency is a valuable goal and a requirement of the current standards. The current standards strive for consistency. It is in the application those standards where consistency issues result. As such, changing the standards will not change adherence or application.

We have discussed these proposed changes with the Board and management. We are unanimous in the belief that the standards governing the fund level financial statements should not be changed. Additionally, unanimous was the belief that the Government-wide financial statements are becoming less useful as a management tool and that the concept of "deferred inflows and outflows" is foreign and not easily explained to the citizenry.

We ask that you reconsider your direction in this effort and not change the reporting model. We thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Wilkinson". The signature is fluid and cursive, with a large initial "K" and a long, sweeping underline.

Kenneth M. Wilkinson, CFA
Lee County Property Appraiser