



## National Association of State Auditors, Comptrollers and Treasurers

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September 29, 2008

Mr. David Bean  
Director of Research and Technical Activities  
Project No. 25-16  
Governmental Accounting Standards Board  
401 Merritt 7  
P.O. Box 5116  
Norwalk, CT 06856-5116

Dear Mr. Bean:

On behalf of the National Association of State Auditors, Comptrollers and Treasurers, I am pleased to provide these comments about the Governmental Accounting Standards Board's proposed technical bulletin, *Determining the Annual Required Contribution Adjustment for Postemployment Benefits*.

NASACT members who provided comments about the proposed TB were unanimous in their support of it. They believe that the provisions are sensible and logical. Among the reasons cited by various members are the following:

- Use of the known amount will improve the accuracy of the OPEB disclosures.
- Use of the known amount is consistent with the intent and objectives of GASB Statement Nos. 27 and 45.
- Use of the known amount eliminates any subjectivity that might creep into an estimate.
- Use of the known amount should lead to more precise measurement of the ARC and improve the reporting of pension and OPEB plans.
- Allowing governments the option of using the known amount, rather than *requiring* the use of the known amount, gives a government the flexibility to select the method that is best for it.

In short, NASACT agrees with the provisions of the proposed technical bulletin and looks forward to its final approval by the GASB.

Thank you for the opportunity to participate in the GASB's due process. Should you have any questions, you may call me at 517-334-8050 or Pat O'Connor or Sheri Rowland of the NASACT staff at 859-276-1147.

Sincerely,

Thomas H. McTavish  
President