



National Association of State Auditors, Comptrollers and Treasurers

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CONTACT INFORMATION

Headquarters Office
449 Lewis Hargett Circle
Suite 290
Lexington, KY 40503-3590
(859) 276-1147
Fax (859) 278-0507

Washington Office
444 N. Capitol Street, NW
Suite 234
Washington, DC 20001
(202) 624-5451
Fax (202) 624-5473

www.nasact.org

August 23, 2013

Mr. David Bean
Director of Research
Governmental Accounting Standards Board
401 Merritt 7
Norwalk, CT 06856-5116

Dear Mr. Bean:

On behalf of the National Association of State Auditors, Comptrollers and Treasurers, we appreciate the opportunity to respond to the Governmental Accounting Standards Board's Exposure Draft (ED), *Pension Transition for Contributions Made Subsequent to the Measurement Date*.

We are in agreement with the provisions of this ED and believe the proposed amendments are appropriate. An amendment to Statement 68 is warranted to prevent some governments from significantly understating the entity's beginning net position and pension expense in the initial period of implementation.

Regarding the Codification Instructions in Appendix C, we believe that since the statement will be authoritative, it should appear in the Codification to allow for proper promulgation of the standard to all interested parties.

We appreciate the opportunity to provide our comments. Should you have any questions or need additional information regarding our response, please contact Kim O'Ryan of NASACT at (859) 276-1147 or me at (505) 955-1120.

Sincerely,

James B. Lewis
NASACT President