

September 13, 2019

Director of Research and Technical Activities
Project No. 30-1
director@gasb.org

RE: Public-Private and Public-Public Partnerships and Availability Payment Arrangements

Dear GASB:

The views expressed herein are written on behalf of the Professional Standards Committee (PSC) of the Texas Society of CPAs. The PSC has been authorized by the Texas Society of CPAs' Board of Directors to submit comments on matters of interest to the membership. The views expressed in this document have not been approved by the Texas Society of CPAs' Board of Directors or Executive Board and, therefore, should not be construed as representing the views or policy of the Texas Society of CPAs. Please find our comments below on the above-referenced exposure draft.

The very specific guidance in the exposure draft will be difficult for small to medium-sized entities or entities with multiple components to implement.

Also, the effective date seems aggressive for the number of changes to the reporting model. Those entities that have many of these arrangements will find it hard to implement the requirements for fiscal years beginning July 1, 2021. The committee recommends delaying the implementation to 2022, due to the complexity of the proposed standard for preparers and auditors.

We appreciate the opportunity to provide input on the exposure draft.

Sincerely,



Ken Sibley, CPA
Chair, Professional Standards Committee
Texas Society of Certified Public Accountants