

March 27, 2019

Director of Research and Technical Activities  
Project No. 3-24  
director@gasb.org

RE: Proposed Implementation Guide – Leases

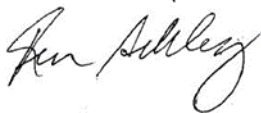
Dear GASB:

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 committee believes the questions and answers section of the Implementation Guide is helpful and we appreciate the guidance on specific situations. The responses given to the various questions helped to clarify some of GASB's definitions; i.e., biological assets. However, the committee would like to see application of the standard to more complex examples than those provided in Appendix B.

We appreciate the opportunity to provide input about the Implementation Guide.

Sincerely,



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