



**DEPARTMENT OF THE TREASURY**  
**WASHINGTON, D.C. 20220**

June 26, 2008

Wendy M. Payne, Executive Director  
Federal Accounting Standards Advisory Board  
Mailstop 6K17V  
441 G Street, NW, Suite 6814  
Washington, DC 20548

Dear Ms. Payne:

Thank you for the opportunity to provide comments on the exposure draft “***Distinguishing Basic Information, Required Supplementary Information, and Other Accompanying Information.***” We think that overall the proposed standard will improve financial reporting in this area. However, we believed that some of the factors in the table were vague and subject to interpretation. For example, the high or low standards to be applied to each criteria did not provide any guidance to those standards. We are providing the following specific comments for your consideration.

1. Do you agree with the process presented? If not, please explain your reasons.

We basically agreed with the process and criteria established in the draft to differentiate between Basic, Required Supplementary Information, and Other Accompanying Information.

2. Do you agree with the factors presented for distinguishing basic information from required supplementary information (See Table 1: Factors to Consider in Distinguishing Basic Information from RSI)?

The table provided some useful insight to help determine whether information to be reported should be classified as Basic or Required Supplementary Information; however, we found the guidelines to be very broad or, with little or no detail to aid users in understanding them.

The fourth factor presented, “Level of importance the Board wishes to be communicated in the financial report,” is not clearly written and does not define what is sought.

The seventh factor, “Extent to which the information interests a wide audience (rather than specialists), also presented an exception for us. We do not believe the audience should determine whether information is Basic and therefore audited, or RSI and “subject to procedures specified by auditing standards,” but not audited.

3. Are there additional factors that should be considered? If so, what are they, and how would you describe them?

We did not identify any other factors that we believed needed to be included.

Again, we appreciate the opportunity to comment on this exposure draft. If we can be of further assistance, please contact Mr. Donald Geiger, Assistant Director, Office of Accounting and Internal Control, on (202) 622-0934.

Sincerely,

(signed – Donald Geiger for Jim Lingeback)

Jim Lingeback  
Director,  
Office of Accounting and Internal Control