



August 28, 2009

Mr. David R. Bean  
Director of Research and Technical Activities  
No. 19-15  
Governmental Accounting Standards Board (GASB)  
401 Merritt 7, P. O. Box 5116  
Norwalk, CT 06856-5116

*Advancing  
Government  
Accountability*

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Alexandria, VA 22301

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Dear Mr. Bean:

On behalf of the Association of Government Accountants (AGA), the Financial Management Standards Board (FMSB or the board) appreciates the opportunity to provide comments to the Governmental Accounting Standards Board (GASB) on its exposure draft of a proposed statement on *OPEB Measurements by Agent Employers and Agent Multiple-Employer Plans*. The FMSB, comprising 21 members with accounting and auditing backgrounds in federal, state and local government, academia and public accounting, reviews and responds to proposed standards and regulations of interest to AGA members. Local AGA chapters and individual members are also encouraged to comment separately.

The proposed statement addresses issues related to the use of the alternative measurement method and the frequency and timing of measurements by employers that participate in the plans. It would amend Statement No. 45 to permit the use of the alternative method. It amends Statement No. 43 as to the requirement to obtain an actuarial valuation. The board agrees with the proposed standard. The revisions will allow for greater consistency and will simplify the measurement for certain governments, creating a more acceptable cost burden as related to the expected benefits. The board applauds the GASB for its efforts to develop the guidance.

We appreciate the opportunity to comment on this document and would be pleased to discuss this letter with you at your convenience. No member objected to its issuance. If you have questions concerning the letter, please contact Anna D. Gowans Miller, CPA, AGA's director of research and staff liaison for the FMSB, at [amiller@agacgfm.org](mailto:amiller@agacgfm.org) or 703.684.6931 ext. 313.

Sincerely,

A handwritten signature in cursive script that reads "Robert L. Childree".

Robert L. Childree, Chair  
AGA Financial Management Standards Board

cc: William A. Morehead, Ph.D., CPA, CGFM  
AGA National President



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Financial Management Standards Board**

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