

From: Kevin Jordan [mailto:kjordan96@hotmail.com]
Sent: Friday, May 10, 2013 12:28 PM
To: GASB Scope
Subject: Comment letter in relation to the Proposed Changes To GASB's Agenda-Setting Process

I am a CPA in the state of Texas and a former Postgraduate Technical Accountant at the FASB. I was recently informed about the proposed changes to the GASB's agenda setting process, which generally would insert the FAF's Standard-Setting Process Oversight Committee into the formation of the agenda for GASB's consideration.

While I agree with the general premise of clarifying the scope of GASB's authority, I am concerned that adding an additional layer of oversight will accomplish that objective. Specifically, items 3 and for of Group 2 on pages 7 and 8 of the proposal are a significant expansion of the FAF's authority and threaten to impair the GASB's independence in the name of clarifying its scope. To be clear, I believe the FAF's current role in appointing the GASB's board, raising funds for the GASB's operations, and consultative oversight of the GASB provides the FAF with sufficient influence to address any scope questions that arise in practice at the GASB if exercised properly.

I encourage the FAF and GASB to determine an alternative approach to clarifying the GASB's scope which does not provide the FAF with any additional influence or implicit or effective veto power over the GASB's agenda. Alternatives may include revisiting the GASB's charter documents or an pursuing an explicit clarification from the AICPA and its largest governmental reporting entities (i.e. the federal and state level financial reporting community) regarding the scope of authority delegated to the GASB.

While not suggested in the proposal, I would be significantly concerned with any similar attempt to expand the FAF's influence over the FASB's agenda.

Thank you for considering my feedback. If you have questions on any aspect of this comment letter, I can be reached at kjordan96@hotmail.com or at 281-381-1190.

Regards,

Kevin Jordan, CPA

Kevin Jordan kjordan96@hotmail.com