

May 13, 2019

To: IPSASB Technical Director

Subject: Comment on Consultation Paper “Measurement”

Many thanks for giving the opportunity to comment on the Consultation Paper “Measurement”.

My comments shall be followings:

1. Measuring all financial statements items, including assets, liabilities, revenues, and expenses need Measurement requirements. In respect of revenues, measurement requirements are considering in “Revenue Project”. Measurement requirements of the assets and liabilities are discussing in “Measurement Project”. But, about the expenses, only some of them, including transaction costs and borrowing costs are dealing with in “Measurement Project”. It will be better if the other expenses, for example expenses in construction contracts, investment property, R&D and etc. deal with in “Measurement Project”.
2. “Impairment” is a part of measurement. However, you exclude it of the scope of the “Measurement Project”. Why you do this? I think it should be considered in this project.
3. If “Measurement Project” results in an IPSAS, the conceptual framework will not contain the Measurement Part. So I think it will be better the result of this project be replaced with chapter 7 of the conceptual framework instead of a new IPSAS.
4. In figure 2.2 “Sources of Guidance”, all measurement bases should be outlay not some of them. So it needs to include “value in use” and “net realizable value”.

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